

CONCERN WORLDWIDE

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This Statement is given on behalf of Concern Worldwide, and its group companies, Concern Worldwide (UK) and Concern Worldwide (Northern Ireland) (together "**Concern**").

About Concern

Concern is an international, humanitarian, non-governmental organisation dedicated to the elimination of extreme poverty and the reduction of human suffering, primarily in fragile countries. Our vision is of a world in which all people live in peace and prosperity and are treated equally, with dignity and respect. We work with people living in extreme poverty to achieve major improvements in their lives which last and spread without ongoing support from Concern. Informed by the priorities of affected communities, we go where the needs are greatest, and work to save lives, protect and develop livelihoods, support recovery and build long-term resilience. Our headquarters are in Ireland, with additional fundraising and support offices in the UK, US and South Korea, and we operate in 24 countries worldwide.

Definitions

Modern slavery "refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power."¹

The term 'supplier' used throughout this Statement refers to any individual, company, organisation, contractor, consultant or entity that provides goods, services or works to Concern.

Safeguarding at Concern

Concern is committed to ensuring that the way in which we conduct our business and dealings with others reflects our values. We strive to ensure that the way in which we work prevents and deters any form of modern slavery and human trafficking from occurring anywhere in our business and supply chain and are committed to the continuing evaluation of our systems and processes to ensure that we can better raise awareness of, prevent, report and respond to issues of modern slavery across the organisation.

Concern has made a simple but powerful commitment to make participation in everything we do as safe as possible for everyone involved. This commitment sits at the heart of our safeguarding framework, which guides how we prevent harm, protect people and uphold the highest standards of conduct across all our work. Modern slavery and related forms of exploitation, such as human trafficking, are explicitly included within Concern's definition of safeguarding. Concern has zero tolerance of all forms of modern slavery and human trafficking and regards them as abhorrent. Any harm caused by a Concern employee or supplier, including acts connected to modern slavery, is treated as a safeguarding concern and constitutes gross misconduct. Our safeguarding approach includes clear reporting channels, strong accountability measures and mandatory reporting obligations for all staff and partners, ensuring concerns are taken seriously and acted upon without delay. Safeguarding adults and children, and preventing all forms of harm, abuse and exploitation, is central to our mission and values.

Our People

Concern employs around 3,000 people worldwide. The dedication and commitment of our staff to our core values is essential to the achievement of our objectives. It is therefore essential that the way we engage with our staff reflects our core values and that we treat people with dignity and respect. In

¹ ILO, Walk Free, IOM, 2022: [Global Estimates of Modern Slavery: Forced Labour and Forced Marriage](#)

addition to our Concern Code of Conduct and its associated policies², to which all employees are required to adhere, Concern's Competency Framework helps us to promote our values through our behaviours.

Concern embeds safeguarding and anti-exploitation standards throughout the employment cycle. Recruitment and selection at Concern is conducted in accordance with the highest ethical standards and in compliance with employment and equality legislation. Our recruitment and selection standards promote equal opportunities, and our global Employment Cycle Pack provides clear guidance and tools for managers to uphold ethical and safe practices at every stage of the employment cycle, from recruitment and onboarding to performance management and exit interviews. We mitigate against potential risks during recruitment and selections stages through rigorous referencing and safeguarding checks, and safe working practices are reinforced throughout the employment cycle to help ensure exploitation, coercion, or abuse cannot take hold within our workforce. We prohibit the solicitation of a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretences, representations, or promises regarding that employment, charging employees recruitment fees, or providing or arranging housing that fails to meet the host country housing and safety standards.

Concern's Global Pay Policy outlines how we make decisions on remuneration, how equality underpins our pay practices, and how our salary structures are bolstered by our Global Banding Framework. The Global Banding Framework ensures a consistent approach to pay across the organisation by grouping roles of similar scope and scale, regardless of location, to a defined global band. While roles are allocated consistently to global bands within the Global Band Framework, the pay levels for the roles are benchmarked locally, thus reflecting the local market.

Each Concern country of operation has a defined pay structure and associated pay management guidelines to support the implementation of the Global Pay Policy. At a minimum, we comply with employment legislation of the country of employment, and where it exists, minimum pay legislation is adhered to. Where the concept of a living wage exists, we benchmark our pay bands accordingly.

Our Supply Chains

With headquarters in Ireland, fundraising and support offices in the UK, US and South Korea, and operations in Africa, Asia and the Caribbean, our supply chains are extensive. In addition to suppliers of goods, a broad range of suppliers such as freight forwarders, transporters, warehousing and distribution personnel provide us with services. Oversight and governance of Concern's supply chains is managed through our procurement policies, with goods and services being sourced and procured in line with our Purchasing Policy which sets out the way in which we engage with our suppliers.

It is essential that we have confidence that our suppliers are working towards meeting the same high standards as we do. In particular, we aim to ensure our suppliers treat their own employees and workers with dignity and respect in a fair and ethical environment. This is reflected by our requirement that all suppliers are expressly bound to comply with the following Concern policies:

- Procurement Policy (See Section 1 below);
- Programme Participant Protection Policy (See Section 2a below);
- Child Safeguarding Policy (see Section 2b below);
- Anti-Trafficking in Persons Policy (see Section 2c below); and
- Whistleblowing Policy (see Section 3 below).

Any failure to adhere to these requirements is a fundamental breach of the terms of the engagement.

² Programme Participant Protection Policy (P4); Child Safeguarding Policy; and Anti-Trafficking in Persons Policy

Our Policies

We have developed and implemented several policies and procedures designed to ensure that the way we work, and the way those working with us behave, is reflective of the principles and standards to which we hold ourselves. These documents are guided by applicable legislation, international standards such those listed under the section on Support for External Initiatives below, and best practice. All of our worldwide policies are available in English and French and some in Arabic too.

1. Procurement Policy

Our Procurement Policy promotes ethical and sustainable procurement. It ensures that Concern staff are clear about the standards expected of those with whom we contract for goods and services and reflects our recognition of the health, safety, environmental and ethical impacts of all supply decisions and involves our suppliers in addressing any issues that may arise.

The central message underlying our policy is that we seek to purchase goods and services which are produced and delivered under conditions that do not involve the abuse or exploitation of any persons. We ensure that all procurement activities are fully and transparently documented, and that all employees involved in procurement comply in all respects with laws that apply to their purchasing activities. Potential suppliers will be considered ineligible if (amongst other things) we become aware that they have engaged in any corrupt, fraudulent, collusive or coercive practices. Our policy also makes it clear that we will seek alternative sources where the conduct of suppliers violates basic human rights, or where companies anywhere in the supply chain are involved in the manufacture of arms or the sale of arms to governments.

Suppliers to our country programmes are required to adhere to certain ethical standards, such as ensuring working conditions are safe and hygienic and the exploitation of children is not tolerated, as part of Concern's Standard Terms and Conditions of Procurement which are available on our website at <https://www.concern.net/accountability/supply-chains>

Concern is a member of the Inter-Agency Procurement Group (IAPG), a group of INGOs that commit to share and exchange supply and procurement related information amongst members. The IAPG develops links with appropriate academic and professional bodies to enhance training opportunities and to provide learning to the academic world and across member organisations. Concern's interaction with the IAPG contributes key learnings which inform our approach to procurement, and we were part of a working group which adapted a shared template for common member use, with the objective of homogenising the conditions to which our shared suppliers are subject.

Using the shared template, during 2025 we developed a Supplier Sustainability and Ethical Code of Conduct (Suppliers Code of Conduct) to incorporate into our Procurement Policy which will be rolled out in 2026. This Code is grounded in internationally recognised standards and principles, including the United Nations Declaration on Human Rights, key Human Rights Treaties such as the UN Convention on the Rights of the Child, and International Labour Standards concerning child labour (ILO Conventions 138 and 182) and forced labour. Concern requires all suppliers to strictly adhere to these foundational principles. The Suppliers Code of Conduct covers standards in the areas of Labour (including modern slavery and human trafficking), Human Rights, Environmental Sustainability, Ethical Conduct (including corruption and conflicts of interest), Safeguarding and Community Impact.

2. Concern Code of Conduct and its associated policies

The Concern Code of Conduct (the "Code") applies to all representatives of the organisation including staff, partners working on Concern programmes, consultants, interns, volunteers,

ambassadors and board members globally. It is a key tool for the prevention of harassment, exploitation, abuse and other inappropriate behaviours.

Our Code affirms that any form of inappropriate behaviour is incompatible with Concern's fundamental belief in the human dignity of all people, and with our core values. Failure to comply with the Code may result in corrective or disciplinary action for any Concern representative. Depending on the role and relationship with Concern, this may include dismissal, suspension or termination of agreements, or other measures deemed necessary to uphold our standards.

The Code requires all representatives to act in a manner consistent with Concern's beliefs, values and mission. It makes clear that any conduct that causes harm or creates risk of harm, including sexual exploitation, abuse or harassment (SEAH), child abuse, child labour, or any other form of exploitation, is strictly prohibited. Representatives must also avoid any engagement in activities that are illegal, violate human rights, compromise the work of Concern, or constitute bullying, harassment, discrimination, intimidation or abuse.

The Code mandates that all Concern representatives report any suspicion, concern, allegation, rumour, disclosure, or witnessed or personally experienced incident of harm or misconduct. Any behaviour that may breach the standards of the Code must be brought to Concern's attention immediately, regardless of the level of certainty. Failure to report a concern is itself a breach of the Code and may result in appropriate corrective or disciplinary action, depending on the individual's role and relationship with Concern.

The Code is supplemented by the following three associated policies. Breaches of these policies may result in action appropriate to an individual's role and relationship with Concern, including dismissal, termination of agreements, or cessation of engagement.

a. Programme Participant Protection Policy

Concern prohibits all forms of abusive or exploitative behaviour and is committed to protecting programme participants from harm. This policy emphasises the need to recognise and mitigate power imbalances, whether real or perceived, and prevent the misuse of authority. To specifically reduce the risk of exploitation, it requires that no individual can create a situation where they may be perceived as having sole or final authority over the allocation of benefits.

b. Child Safeguarding Policy

Concern believes that children face particular vulnerabilities and require additional protection. This policy ensures that safeguarding children is integral to all of our work and that robust measures are in place to prevent, identify and respond to risks of harm, abuse or exploitation involving children.

c. Anti-Trafficking in Persons Policy

Concern unequivocally condemns trafficking in human beings. This policy prohibits all individuals and entities working with or for Concern from engaging in any form of trafficking. This includes but is not limited to trafficking for sexual exploitation; forced marriage; the illicit organ or narcotics trade; involuntary servitude; or forced labour.

Concern's Code of Conduct and its associated policies are published on our website: <https://www.concern.net/accountability/codes-and-policies>

3. Whistleblowing Policy

We are committed to the highest possible standards of openness, transparency and accountability in all our affairs. Our Whistleblowing Policy provides a safe and accessible way for any Concern

representative to raise or disclose concerns at an early stage. We actively encourage people to speak up, whether they have witnessed harm, become aware of it, or have reason to suspect wrongdoing.

Concern operates a designated whistleblowing helpline and ensures that all reports are treated with utmost sensitivity and confidentially. No person who raises a concern in good faith will be subjected to harassment or disadvantage, and we have a zero tolerance for retaliation. The whistleblowing mechanism also provides a route for individuals who are dissatisfied with how a concern or complaint was initially handled, ensuring an additional safeguard and avenue for escalation.

The Whistleblowing Policy is available on our website:

<https://www.concern.net/accountability/codes-and-policies>

Complaints

Concern is committed to providing safe, accessible and effective ways both locally and via global reporting channels for anyone to raise complaints or concerns about the work or behaviour of our representatives. Our feedback, complaints and reporting mechanisms across the globe deliberately offer multiple means of reporting concerns, including potential violations of the Concern Code of Conduct or any of its associated policies (including this Statement). Complaints are recorded and segregated according to type, which includes a record for complaints which constitute or relate to modern slavery.

As part of strengthening our reporting environment, in September 2025 Concern began trialling SpeakUp, a confidential global reporting channel that provides staff with a safe and secure way to raise concerns. SpeakUp enables employees to report suspected misconduct, including concerns related to exploitation, coercion, trafficking or other safeguarding violations, without fear of reprisal, and in a way that is accessible regardless of location. SpeakUp complements existing local and global reporting mechanisms by providing an additional, anonymous route for raising concerns where staff may not feel comfortable using traditional channels. Across all mechanisms, Concern ensures that complaints are handled promptly, appropriately and safely, with actions taken to address the issue and prevent recurrence.

Support for External Initiatives

In addition to our operational policies and procedures, Concern is a member or supporter of several initiatives that seek to address modern slavery risks:

- United Nations Global Compact – The world’s largest corporate sustainability initiative which calls on organisations to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals. The Compact’s principles include the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.
- International Labour Organization (ILO) – A United Nations agency that sets global standards for labour conditions to ensure working conditions are safe and hygienic and the exploitation of children is not tolerated.
- Ethical Trade Initiative (ETI) – An alliance of businesses, trade unions and NGOs working to reduce exploitation and ensure all workers enjoy conditions of freedom, security and equity.
- Proudly Made in Africa – A trade justice and global citizenship education programme that aspires for a world where African communities thrive and entrepreneurs and their businesses capture the value of their own talent and resources through responsible, ethical and sustainable trade practices creating fair incomes, equal opportunities and well-paying jobs on the continent.

- Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel – An agreement which affirms the signatories' understanding and commitment to implementing the Inter-Agency Standing Committee's six core principles which establish a zero-tolerance policy to sexual exploitation and abuse.

Assessing and Managing Risks

Concern has a Risk Management Policy that is owned by the Head of Compliance and Risk and provides a framework for management to identify, analyse and evaluate risk, and to develop strategies to deal with those risks identified so as to provide reasonable assurance that Concern's objectives can be achieved in accordance with the organisation's risk appetite. An annual Risk Review Workshop is held with staff from across the organisation where risks are discussed and debated, informed by the current geopolitical situation, best practice, peer learning, etc. The Concern risk register is updated bi-annually and monitored on a quarterly basis. One of the key organisational risks identified within this register relates to safeguarding. It is stated under this risk that Concern has zero-tolerance for exploitation in all its forms and continues to invest significant resources to design and embed policies and procedures that reduce its occurrence.

Concern's consideration and treatment of risk is embedded across all functions within the organisation. The particular functions that manage and mitigate the risk of modern slavery are detailed below, with a brief outline of their key policies and controls. These functions carry out regular periodic reviews of policies and their implementation, to ensure our policies remain relevant, adequately mitigate risks as they evolve, and remain fit for purpose. The Logistics team has responsibility for our approach to procurement worldwide. HR has oversight of employment related policies, including on pay and our Code of Conduct and associated policies which apply to all employees. All Concern policies are made available to staff through a dedicated page on our intranet, with key updates shared via organisation wide communications, often supported by videos or webinars.

Concern's safeguarding framework is strengthened by dedicated safeguarding capacity across key functions, including our Safe and Inclusive Programming Unit (SIPU) and our Internal Audit and Investigations Team based in headquarters. SIPU provides technical leadership and oversight for safeguarding and inclusion and supports the organisation to embed these standards across our work. SIPU also leads the triage, risk assessment and referral processes for safeguarding complaints, including those involving modern slavery, ensuring that cases are managed safely and consistently.

The Internal Audit team provide independent assurance by reviewing the controls and systems in place in Concern designed to ensure compliance with safeguarding and anti-exploitation standards. In addition to working closely with SIPU to triage safeguarding complaints, including those involving modern slavery, the trained investigators on the Investigations team conduct impartial, confidential investigations into allegations of harm, abuse, misconduct or exploitation. Together, these functions play a critical role in identifying risks, strengthening accountability, and ensuring that safeguarding concerns are effectively managed across the organisation.

Training

Training at Concern is developed through a structured process that begins with a clear understanding of organisational goals, assessment of learner needs and identification of learning objectives. Drawing on good practice standards, the content is then designed to align with these objectives and delivered using suitable methods such as e-learning, webinars or workshops. Once delivered, training is evaluated to determine its effectiveness and the results used to inform any necessary revisions, ensuring training remains relevant, engaging, and aligned with organisational priorities.

Ensuring that all staff understand their safeguarding responsibilities including the prevention of modern slavery and human trafficking is essential to our work. All employees are required to adhere to our Code of Conduct and the values and principles set out within it, and we support them to do so through comprehensive and ongoing training. All staff undergo mandatory safeguarding induction training and annual refresher training. This training was updated in 2025 and now includes specific exercises designed to help staff recognise, prevent and report potential instances of modern slavery and human trafficking.

Awareness sessions were held during 2025 to remind staff of their duty to report wrongdoing, the protections available to them when doing so, and the importance of timely reporting for preventing harm. Concern is supported by a network of designated safeguarding focal points in each country in which we work. These focal points volunteer a portion of their time to raising awareness among staff and communities and supporting people to report safeguarding concerns, including those related to modern slavery and human trafficking.

Concern implements an annual Safeguarding Week that brings the organisation together to raise awareness, share learning, and promote good safeguarding practice across all offices and country programmes. It features messages from leadership, showcases global safeguarding efforts, and highlights good practice examples from country teams, culminating in the launch of updated tools and resources that strengthen our collective safeguarding approach.

Our Regional Logistics Advisers conduct regular training in their respective countries on specific areas of procurement, including modern slavery risks. In addition, full 5-day logistics workshops, which include modules on procurement and modern slavery are carried out in up to five countries annually. In 2025, workshops were delivered in Ethiopia, Somalia x 2 (Mogadishu and Hargeisa) and Haiti.

In December 2025, our Fraud Awareness Week focused attention on fraud prevention and detection at Concern, including a focus on high risk areas such as procurement fraud through use of case studies. The initiative provided a reminder that corruption takes many forms including abuse of power and reinforced Concern's commitment to ensuring transparency, integrity, and trust in everything we do.

Across 2025, training and capacity building of staff was a cornerstone of the Internal Audit and Investigations strategic agenda. The team delivered strongly against this objective, reaching more than 890 staff globally through:

- 4 week-long Investigator Training workshops
- 6 online Misconduct Investigations training sessions, delivered in English, French and Arabic
- 22 Fraud and Safeguarding Awareness sessions, the majority delivered in-person during country visits

These initiatives enhanced organisational capability to prevent, detect, and respond to misconduct. A key change in 2025 was the inclusion of local partner staff at many of our Investigator Training workshops and our Fraud and Safeguarding Awareness sessions, supporting Concern's localisation and partner capacity building objectives.

Monitoring and Evaluation

We recognise the importance of monitoring our progress and performance in managing modern slavery risks and will use this information to determine whether the actions we have taken have been effective. During 2025 we worked across our organisational functions to consolidate our framework for managing modern slavery risks in a cohesive fashion. This consolidated framework will provide the basis for the organisation to identify and set specific goals and key performance indicators to monitor and evaluate our actions in a clear and measurable way.

Looking Back

Based on the outcome of an assessment conducted using the UK Foreign, Commonwealth and Development Office (FCDO) Modern Slavery Assessment Tool (MSAT), an action plan to strength our management of modern slavery risks was put in place in 2023. The initial phase of the plan was completed in 2024. The final stage was to include a review of supply chains in a sample of countries to identify the principal risk areas for modern slavery and identify the steps needed to evaluate and manage those risks. Instead of completing this final stage, Concern, during 2025, elected to reconsider how best to ensure the effective identification, evaluation and management of the modern slavery risks in its supply chain and determine a suitable approach for future implementation.

We took the following actions in 2025 to improve our management of modern slavery risks:

- Developed our Supplier Sustainability and Ethical Code of Conduct which sets out the minimum standard required of suppliers and encourages them to adopt continuous improvement approaches in their operations and consider innovation as a catalyst for change.
- Strengthened our safeguarding architecture by integrating protection, safeguarding, accountability and inclusion into a single organisational function, thereby improving coherence across systems and ensuring that risk identification, mitigation and response measures are applied consistently throughout programme design, monitoring, supply chain oversight and staff support processes.
- Began trialling a confidential global reporting channel that provides staff with a safe and secure way to raise concerns, to strengthening our reporting environment.
- Updated our mandatory safeguarding training to include exercises to help staff recognise, prevent and report potential instances of modern slavery and human trafficking.
- Continued to require all new staff to undergo mandatory safeguarding induction training and existing staff to complete annual refresher training.
- Continued implementing our 'Safeguarding in the Employment Cycle Pack' across all country offices, strengthening safe recruitment practices including referencing, safeguarding checks, and risk-informed onboarding to reduce the risk of exploitation, coercion or abuse at any stage of the employment cycle.
- Provided training on specific areas of procurement, including modern slavery risks, and delivered country specific logistic training programmes, which included sessions on modern slavery, in four of our countries of operation.
- Provided training on investigations and on fraud and safeguarding awareness to both Concern and partner staff with the goal of building capacity to prevent, detect, and respond to misconduct.
- Established a small group comprising key staff from Compliance and Legal, Safeguarding, Logistics and Advocacy, including senior management, to gain a better overview of the measures taken by Concern to manage modern slavery risks and coordinate the preparation of this Statement by reference to statutory guidance.³

³ UK Home Office 2025: [Transparency In Supply Chains - A practical guide](#)

Looking Ahead

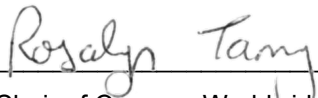
Compliance with the Modern Slavery Act is an ongoing commitment. In 2026 Concern will continue to develop the way it works to ensure that slavery and human trafficking play no part in our business or supply chain. Our goals are to:

- Launch our new Suppliers Code of Conduct, followed by a global webinar which will explain the key requirements and emphasise the Code's importance in managing modern slavery risks.
- Train Concern staff on how to educate suppliers on the requirements of the new Supplier Code of Conduct and build capacity to manage their own contractor and subcontractor networks in relation to the requirements / local roll out.
- Continue implementation of our logistic training programme, with the information on managing modern slavery risks strengthened still further as part of a restructuring of the programme.
- Continue the trial of a new reporting channel, while providing training to partners and staff so that they understand how to safely raise concerns and to reinforce a shared culture of transparency, accountability and early reporting.
- Continue in our capacity building agenda with ongoing training offerings for both Concern and partner staff in Safeguarding, Fraud Awareness, and Investigations.
- Pending final approval from the Republic of Ireland Data Protection Commission, we intend to become a signatory to the Misconduct Disclosure Scheme (MDS), which strengthens safe recruitment across the humanitarian sector. Participation in this scheme will reduce still further the risk of individuals who may pose safeguarding or exploitation risks being hired within the sector and reinforces our commitment to maintaining a safe, respectful and abuse free working environment.
- Repeat and update the UK Foreign, Commonwealth and Development Office (FCDO) Modern Slavery Assessment Tool (MSAT) to identify areas in our current management of modern slavery risks which could be strengthened.
- Identify and set specific key performance indicators to monitor and measure the effectiveness of the steps we have taken to combat modern slavery.
- Establish a group to monitor the measures taken by Concern to manage modern slavery risks and coordinate the preparation of our annual Statement on a permanent basis, with clear Terms of Reference and suitable membership.

Signature

This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Concern's slavery and human trafficking Statement for the financial year ending 31st December 2025.

This Statement was approved by Concern Worldwide's Board of Directors.



Chair of Concern Worldwide

April 25, 2026

Date