

# **Modern slavery statement**

January to December 2025



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## Introduction

Sightsavers is committed to continuously improving practices to combat modern slavery and human trafficking. We have a zero-tolerance approach to modern slavery within our operations and strive to act ethically and with integrity to ensure modern slavery is not taking place in any part of our organisation or supply chain.

This statement sets out the steps that we have taken to mitigate, as far as possible, the risk of modern slavery and human trafficking taking place in our organisation and supply chains. It explains how we have addressed modern slavery risks during 2025, the effectiveness of our measures, and how we plan to strengthen them through 2026 in line with the updated Home Office guidance.

## Modern Slavery Act 2015

The Modern Slavery Act 2015 requires large UK organisations to publish annual statements to report on the steps they are taking to ensure that modern slavery and human trafficking are not taking place in their operations and in the supply chains that provide their goods and services.

Modern Slavery is an overarching term used to describe a wide range of exploitation of labour, including slavery, forced or compulsory labour, servitude and other types of bonded labour, human trafficking and child labour.

## Our organisation

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Sightsavers is the working name of the Royal Commonwealth Society for the Blind, an international organisation that supports the development of health systems in low and middle-income countries and aims to advance the rights and improve the quality of life of people with disabilities. Our programmes include health, education and social inclusion projects in more than 30 countries, working with government bodies, other non-governmental organisations and the private sector.

We have a governing board of non-executive trustees, who are committed to maintaining a high standard of corporate governance. They oversee the CEO and senior management team, who manage more than 800 staff across the organisation, both in the UK where the headquarters are based and overseas in more than 30 countries, mainly across Africa and South East Asia.

You can find out more about our Governance and Structure, and about our UK and international activities, in our annual report at <https://www.sightsavers.org/how-we-run/annual-reports/>

## Our policies on modern slavery and human trafficking

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Our framework of policies and procedures are regularly reviewed to identify and mitigate modern slavery risks and to ensure alignment with the UK Modern Slavery Act 2015.

We require that all Sightsavers staff, subsidiaries and affiliates comply with Sightsavers' **Global Anti-Slavery Policy**.

The policy's objectives are:

- Not to directly support any organisation, initiative or activity that causes, promotes or contributes to modern slavery or human trafficking.
- Not to engage, contract or work with any entity or organisation that causes, promotes or contributes to modern slavery or human trafficking.
- To ensure any victims have access to remediation and justice.
- To maintain risk-assessed and transparent supply chains.
- To publish and maintain Sightsavers Statement on compliance with the requirements of MSA 2015.
- To remain aligned and co-operate with activities of the UK Anti-Slavery Commissioner.

In addition to our Global Anti-Slavery Policy, our wider policy and process framework addresses risks regarding modern slavery as follows:

- **Global Safeguarding Policy** - which minimises the risk of harm, exploitation or abuse of children and adults from staff, operations and programme activities. All staff, representatives and partner organisations are required to comply with this Policy.

- **Fundraising Donation Acceptance Policy** – we follow the UK Institute of Fundraising codes of practice with regards to dealing with vulnerable people and follow similar approaches in other countries.
- **Our Global Whistleblowing Policy** outlines processes and channels for internal reporting and the Global Grievance Policy enables employees to raise concerns, problems or complaints relating to the terms of their employment, health and safety, work environment or working practices.
- Our **Global Leave Policy** encourages all staff to take the annual leave to which they are entitled. If any staff are required to work more than their contractual hours, the **Global Time Off in Lieu and Overtime Policy** entitles them to take an equal amount of time off in lieu.
- Our **Ethical Content Policy** – In line with Sightsavers' Ethical content collection guidance, all programme participants must fully understand how, where and why we will use their content and understand any potential consequences of it being made public or used online.
- If an employee or any other stakeholder believes malpractice, unethical conduct or illegal practices are taking place, our **Global Speak Up platform** provides a confidential mechanism for reporting, investigating and remedying any wrongdoing.
- All policies are reviewed in accordance with their review cycle by the Global Governance and Assurance team, and compliance is monitored through internal audit and partner-assurance processes. Policy awareness is promoted through mandatory e-learning and induction briefings.

## Suppliers' and partners' adherence to our values and ethics

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Modern slavery is particularly apparent in certain industries operating in specific regions of the world. High-risk industries globally include agriculture, food processing, construction, textiles, and security services, which inform our supplier and partner risk assessments.

In the UK, relevant sectors that have a higher risk of modern slavery include hospitality, cleaning services, construction sites, farms and food processing facilities.

Our assessment of the overall risk of modern slavery posed to our business and supply chain is low, however the impact of the risk is high.

As part of our due diligence process, suppliers and partners are screened through Sightsavers' Supplier Management Platform and Partner Due Diligence process, both of which include modern slavery indicators.

Sightsavers believes that change can only come from working closely with our suppliers and partners. Our higher-risk suppliers include providers of security, facilities, and temporary staffing services, and local suppliers operating in fragile or low-governance contexts.

We continued to address these risks by deploying a series of mitigation activities in 2025. These include the deployment of enhanced training of staff working directly with our supply

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chain and additional due diligence and audits, both at global and community levels. We engaged more with our partners, running awareness training sessions with our local partners.

Our supply chain includes goods and services procured for our UK operations and international programmes, such as IT, construction, travel, security, logistics, and consultancy. We also work through local partner organisations and suppliers at the community level. During 2026, we will investigate any gaps in our existing supplier onboarding and vetting process to improve transparency and traceability.

Our **Programme Partnership Policy** requires Sightsavers and its partners to remain fair and ethical in all business matters, and states that Sightsavers will not enter into partnership with any organisation that exposes people to abuse and exploitation or is involved in any illegal activity. Before entering into any partnership, Sightsavers carries out **a due diligence risk assessment** to build a complete picture of each potential partner. If any risks or weaknesses are revealed, they are analysed and an action plan is drawn up to address them, which could include offering additional support to the partner, putting in place closer monitoring processes, or establishing more rigorous controls. If the risks or weaknesses are too severe, we will not work with the organisation. This due diligence assessment is being reviewed to ensure that we only choose to work with those who meet our standards.

Our modern-slavery risk-assessment methodology considers country exposure, sector and labour-practice risk, and supplier or partner capacity. Internal audit findings are reviewed by the Audit Committee to ensure that proportionate mitigation plans are in place.

Sightsavers has signed its support for the **United Nations Global Compact** and **The Ten Principles**. These principles include the protection of human rights, freedom of association and elimination of all forms of forced, compulsory and child labour.

Sightsavers is a member of the International Agency for the Prevention of Blindness (IAPB) and has adopted the **IAPB Code of Conduct for IAPB Suppliers and Manufacturers**. This Code commits suppliers to uphold safe, fair, and non-discriminatory working conditions and prohibits forced or child labour. Compliance with the Code is a condition of Sightsavers' partnership agreements. These requirements are stated in Sightsavers' **Code of Conduct**. All programmatic suppliers and partners are required to sign the code, and we assume that by signing, they agree to adhere to the conditions of the code and will reasonably enforce the same with their contractors.

We remove suppliers from our approved supplier list where companies in the supply chain are found to be involved in violation of basic human rights and there is no willingness to address the situation within a reasonable timeframe if requested to do so.

## Key performance indicators

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Sightsavers uses Key Performance Indicators (KPIs) related to our work on combatting Modern Slavery, allowing us to have greater visibility of risks.

KPI 1 - All joiners to the supply chain, procurement, and resilience teams to undertake the course within one month of joining. An annual refresher session is delivered to maintain

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competence, and progress is reported quarterly to the Global Risk and Compliance Committee

KPI 2 - Modern Slavery risk assessment to take place on all new partners where Sightsavers is a project lead. With the help of various teams in our organisation, we monitor and report on the number of risk assessments undertaken on new partners. In 2025, all newly assessed partners met the required standards, with none identified as needing corrective-action plans

KPI 3 - Sightsavers ensures that all suppliers have signed the Code of Conduct which incorporates our Modern Slavery expectations. . Compliance rates are tracked through our Supplier Management Platform, with data being reported to Sightsavers' Senior Management Team quarterly.

KPI 4 - Modern Slavery questions are incorporated into all the partner due diligence reviews. The questionnaire includes indicators on employment practices, worker welfare, and grievance mechanisms, and findings inform partner-support or training plans.

KPI 5 - Monitoring, awareness raising and training provided to all partners. Modern Slavery was embedded into the Safeguarding training in November 2024 incorporating an overview of Modern Slavery and our role in ensuring it does not occur in our operations. We carried out a Safeguarding training in April 2025 and this will expand in 2026 to cover country-specific risks and the escalation process for reporting concerns.

## Incidents

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We have had no reports or incidences of modern slavery or human trafficking in our operations or supply chains in 2025.

Where concerns are raised, we follow a formal escalation and remediation process managed by the Global Safeguarding and Compliance teams, ensuring appropriate support for affected individuals.

## Training and awareness

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All policies are promoted and enforced across our business. We updated our Global Anti-Slavery policy in January 2025 making amendments to our KPIs and mitigating activities. We conduct in-person training with our local partners where this is required. In 2026 we will roll out additional training sessions across supply-chain, procurement, and programme teams focusing on the updated Home Office guidance, practical due-diligence skills, and identification of exploitation indicators.

Staff receive training through our e-learning platform to ensure that they are familiar with policies, processes and reporting lines outlined throughout this statement. . Our modern slavery training is mandatory for all supply chain staff and is refreshed annually. In 2024, 100% of new supply-chain staff completed the training within one month of joining, and we aim to reach 90% of all staff and 80% of partners by the end of 2026.

## Further actions

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We are committed to continuing to combat modern slavery, and to build on the steps already taken regarding the supply chains for our UK and international operations.

The issue of international supply chains is especially complicated, and we work alongside our colleagues to improve awareness and understanding of modern slavery issues. This includes training of staff members and (in some contexts where it is considered necessary) partners, due diligence on suppliers, and the procedures for identifying and reporting modern slavery incidents and concerns.

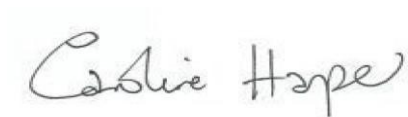
Our 2026 priorities include rolling out enhanced training and awareness campaigns for staff and partners, integrating modern-slavery risk reporting into the global audit cycle, mapping our programme supply chains and publishing a summary of findings and progress in our 2026 statement.

## Signature

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This statement has been approved by the Board of Trustees of Sightsavers on 29 January 2026 and signed by Caroline Harper, CEO.

It is published on the Sightsavers website in accordance with Section 54(1) of the UK Modern Slavery Act 2015 and will be reviewed annually.



**Dr Caroline Harper, CBE**

Chief executive officer