

Modern Slavery Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Imperial College London's slavery and human trafficking statement for the financial year ending July 2019.

Our Business

Imperial College London ("**Imperial**" or the "**College**") is an independent corporation whose legal status is derived from a Royal Charter granted under Letters Paten in 1907 and is also an exempt charity under the Charities Act 2011. Imperial is renowned for its teaching and research in the areas of science, technology, engineering, medicine and business. Imperial has three academic Faculties and a Business School, various support services departments and a number of wholly-owned subsidiaries. In total the College has six main campuses within central London – South Kensington, White City, Hammersmith, St Mary's, Charing Cross, Royal Brompton and Chelsea & Westminster, as well as a campus at Northwick Park (Middlesex), and Silwood Park (Ascot, Berkshire). This statement includes the College's wholly-owned subsidiaries.

The College is committed to combatting slavery and human trafficking and to acting with integrity in all its relationships. This statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015 (the "**Act**"), by informing our students, staff and the public about Imperial and its policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

Our Categories

Imperial's supply chains mainly fall under one of the following five categories:

- Science, technical, engineering and medical equipment and services
- Laboratory equipment, consumables and chemicals
- Professional and operational goods and services
- ICT equipment and services
- Estates-related goods and services, including construction and building works

The principal areas which carry material risks are office supplies, laboratory consumables, ICT and AV equipment, and some estates services, such as cleaning and construction.

Due Diligence

The supply chain of the College includes a large number of diverse suppliers, including suppliers of goods and services that directly support research and teaching activity, and suppliers of indirect goods and services not directly related to these activities. In order to identify and mitigate risk in the supply chain, there are systems in place to identify and assess potential risk areas and mitigate the risk of slavery and human trafficking occurring in the supply chain. More specifically:

- the College requires suppliers to complete a due diligence questionnaire for all major contracts exceeding £100,000. This questionnaire requires suppliers to confirm that they are compliant with the Act, and allows for potential rejection on the grounds of convictions under the Act; and
- all College preferred suppliers have to confirm annually that no convictions have occurred in relation to the Act, or if a conviction has occurred that appropriate steps have been taken to rectify the identified issues.

In addition, as a member of the Southern Universities Purchasing Consortium (SUPC), Imperial works closely with the Consortium to ensure nationally negotiated agreements used by the College comply with the Act. SUPC recommends that organisations ask suppliers in higher-risk areas to commit to the Base Code of the Ethical Trading Initiative (ETI) which is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice one of whose key pillars is “there is no forced, bonded or involuntary prison labour”. The SUPC also works to persuade all suppliers in higher-risk areas to support the ETI. Imperial supports this Initiative. Further, SUPC supports the principles of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe. Electronics Watch has included the appropriate contract monitoring clauses in all relevant national agreements awarded which the College may utilize from time to time. During 2018, Electronics Watch conducted reviews and audits at factories operated by sub-contractors to Apple, Dell and HP in China, India and the Czech Republic, all key suppliers to the College. No breaches of the Act have been reported during the current period.

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Further steps

We will review the effectiveness of the steps we have taken annually to ensure that there is no slavery or human trafficking in our supply chains.

Professor Ian Walmsley
Provost

Imperial College London

31 November 2019