Modern slavery statement
Wellcome is strongly opposed to slavery and human trafficking.

We strive to act ethically and with integrity in all of our business dealings and relationships to ensure that slavery and human trafficking is not taking place anywhere within our organisation or our supply chains.

This statement provides some background to our organisation and our supply chains and sets out the steps we have taken during the financial year ended 30 September 2016 to ensure that slavery and human trafficking is not taking place in our organisation or any of our supply chains.

Eliza Manningham-Buller, Chair
Jeremy Farrar, Director
12 December 2016

Our organisation

Wellcome is a charity registered in England and Wales. We are a charitable trust and our sole trustee is The Wellcome Trust Limited, a company limited by guarantee registered in England and Wales. We have two subsidiaries that are charities, two trading subsidiaries that support our own activities, and a number of subsidiaries within our investment portfolio. This statement covers the Wellcome Trust, its trustee company The Wellcome Trust Limited, and our two trading subsidiaries.

Wellcome exists to improve health for everyone by helping great ideas to thrive. Our investment portfolio gives us the independence to support scientists and researchers, take on big problems, fuel imaginations, and spark debate.

Wellcome is primarily a grant-giving charity and our primary activities relate to and support our grant-making function. Wellcome is a London Living Wage
accrédité et emploie environ 750 personnes, opérant à partir de
notre siège central à Londres.

Nos activités sont supervisées par notre Conseil de Gouverneurs
qui ont la responsabilité ultime pour tout ce que nous faisons. Avec
Notre leadership exécutif dépend directement du Conseil de
Gouverneurs.

Plus d’informations sur notre cadre de gouvernance.

Nos politiques et procédures

Nous mettons en œuvre un certain nombre de politiques et
procédures qui reflètent notre engagement à agir correctement dans toutes
nos relations commerciales et à mettre en œuvre et implanter des systèmes et des contrôles
efficaces. Ils s’appliquent à tous nos employés et à toute personne
engagée sur une base temporaire.

Nos politiques clés et procédures qui contribuent à minimiser le risque de
souffrance moderne et human trafficking dans notre organisation et notre chaîne
d’approvisionnement incluent notre:

- Politique de gestion des risques - qui est conçue pour maintenir toutes
nosses activités en conformité avec toutes les lois, réglementations et codes de gouvernance
(incluant en relation à la souffrance moderne et human trafficking).
- Politique de santé, de sécurité et de l’environnement - un objectif majeur de
qui est de garantir le bien-être de tous nos employés et toute personne qui peut être
influencée par nos activités.
- Procédures HR - nous vérifions que tous nos employés ont des documents de travail
appropriés et qu’ils sont payés correctement et bénéficient d’un
paquet de rémunération concurrentiel. Nous avons des procédures en place pour
protéger les intérêts des jeunes et des volontaires de travail non rémunéré
travaillant à Wellcome.
- Politique d’acquisition - qui définit un certain nombre de facteurs à prendre en
compte lors du choix de nos fournisseurs, y compris si le fournisseur sera une bonne
entreprise pour Wellcome. Cela implique des considérations en matière de
crédits de fournisseur et de conformité avec la loi et des procédures éthiques.
- Politique des accords - nos modèles d’accords et nos conditions standard
requièrent que les fournisseurs respectent la loi (y compris en relation à la souffrance moderne et human trafficking).
• **Fraud and corruption policy** – which 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** – which provides guidance on how to report suspected dangers or wrongdoing in the workplace.

Our policies are monitored by a relevant policy owner within our organisation and reviewed at least every two years. We will continue to review our policies to ensure that they are effective and appropriate.

In particular, we are currently reviewing and strengthening our procurement policy and processes, taking into account a range of risks, including slavery and human trafficking. This is being led by our procurement team, assisted by our legal team.

**Our supply chain**

We use suppliers to support the operations of our organisation. The key areas in which we engage suppliers are:

- facilities management
- construction and design
- information technology
- finance
- legal and investments

**Our supply chain due diligence**

We have looked at all our suppliers and assessed our key suppliers in more detail to ensure that they have appropriate policies in place to minimise the risk of slavery and human trafficking in their business.

Based on our review, we are satisfied that our key suppliers have appropriate policies in place.

We also carry out due diligence checks on material suppliers and routinely monitor their compliance with applicable law (including in relation to slavery and human trafficking) as well as certain 'key performance indicators' such as training and paying the London Living Wage or the National Living Wage.

Due diligence and monitoring is ongoing and under review to improve supplier vetting and to further minimise a range of risks, including slavery and human trafficking.
trafficking. This is being led by our procurement team, assisted by our legal team.

Our procurement team is also looking to foster long-term relationships with suppliers, through which policies aimed at minimising a range of risks (including the risk of slavery and human trafficking) can be advanced.

We also deal with many organisations through our grant and investments activities. As a next step beyond the legal requirements we will carry out an assessment of key aspects of these activities to understand the risk of slavery and human trafficking in these areas and how to reduce those risks.

Training

We try to ensure that adequate information and training is provided to all our employees, contractors or visitors on all relevant matters. Here are some examples of the information and training we provide:

- All new joiners attend an induction session which includes information and training on our policies. We are updating these induction sessions to include specific reference to the issue of modern slavery and human trafficking and what we do to minimise the risk of this occurring in our organisation and our supply chain. Next year, we are also promoting awareness of our policies for all staff through our ‘Policy of the month’ initiative.
- Our managers are provided with a range of leadership training and are assisted by our HR team in HR-related matters including in relation to recruitment, remuneration and employee wellbeing.
- Our procurement team, assisted by our legal team, routinely seek out information and training to help identify and address risks in both our organisation and supply chain (including in relation to slavery and human trafficking) and will continue to do so.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Wellcome’s modern slavery and human trafficking statement for the financial year 1 October 2015 to 30 September 2016.