

## 2022-2023 MODERN SLAVERY STATEMENT

The Crick is strongly opposed to slavery and human trafficking.

We recognise our responsibility to help identify and eliminate modern slavery through our activities.

We will seek to ensure that effective due diligence procedures are in place to safeguard against any form of modern slavery taking place within our institute or our supply chain. These procedures are reviewed and will be continuously improved upon over time.

The Crick is committed to better understanding its supply chains and working for greater transparency and responsibility towards people working within them.

This statement was approved and published by the Crick Board of Trustees and will continue to be reviewed at least annually.

Lord Browne of Madingley  
Chairman  
The Francis Crick Institute  
28 September 2023

Sir Paul Nurse  
Director  
The Francis Crick Institute  
28 September 2023

### INTRODUCTION

This statement is designed to satisfy the requirements of Section 54 of the [Modern Slavery Act 2015](#), by informing staff and public stakeholders about the Crick and its policy to prevent and address modern slavery, human trafficking, forced and bonded labour and human and labour rights violations in its supply chains, and the steps taken to identify, prevent and mitigate such risks.

The Francis Crick Institute ('Crick') was established to be a UK flagship for discovery research in biomedicine. Our mission and strategy is [Discovery Without Boundaries](#); to carry out world-class discovery research to understand how living things work and to drive benefits for human health.

To deliver our mission, we bring together expertise from different scientific disciplines and work with different types of organisations across the academic, clinical and industrial spheres. This creates a space for discovery without boundaries and supports the translation of discoveries into health benefits.

The Crick is committed to acting ethically, with integrity and transparency across our supply chain. We have, and continue to put in place, appropriate processes intended to safeguard against any form of modern slavery taking place within our procurement, supply chain or contract management operations. A key driver of future action is to engage with all elements of the Crick community, so that they are aware of potential issues and risks, as well as embedding policies and practices that safeguard against modern slavery.

## REPORTING ON OBJECTIVES FOR 2021-2022

The below table reports, at a high level, on commitments made in our 2021-2022 Modern Slavery Statement.

2021-2022 Objectives	What was achieved?	Comments
Implement a new eSourcing platform to augment and automate our Supplier Relationship Management ('SRM') process.	Core modules implemented	SRM module completion due in September 2023.
The Sourcing and Legal, Governance and Compliance teams to undertake supply chain-focussed modern slavery training.	Complete	See Training Objective 2023/24 for linked follow-up activity.
Development of a new Responsible Sourcing Policy.	Paused	Drafting was completed but approval was paused while an overarching Crick Sustainability Strategy was devised to ensure there was no conflict between the two documents.

## CRICK STRUCTURE, GOVERNANCE AND MANAGEMENT

The Crick is a company limited by shares and a registered charity. It was established by our six founding partners: UK Research and Innovation Medical Research Council, Cancer Research UK, Wellcome, University College London, Imperial College London and King's College London.

The institute is governed by its [Board of Trustees](#), comprised of independent members and representatives from each of our founding partners. The Board sets the strategic direction of the institute and is responsible for ensuring that the charity's aims are being met. This includes oversight and accountability for addressing and preventing modern slavery. The [Executive Committee](#), led by Sir Paul Nurse, is responsible for developing the Crick's strategy and day-to-day management of the charity, including its scientific vision and research strategy, operations and activities.

The Crick's workforce comprises highly educated professional occupations and we do not directly employ staff in categories typically deemed to be vulnerable to modern slavery in the UK. The focus of the Crick is, therefore, on our supply chain and on ensuring there are appropriate safeguards in place in our relationships with contractors and suppliers.

In 2022-2023, work on modern slavery was principally led by the Sustainability and Equality, Diversity and Inclusion teams, supported by a nominated lead for responsible sourcing. An objective for 2023-2024 is to expand the reach to include our Philanthropy, Grants and Commercial teams who also engage with third parties that may carry some risk related to modern slavery and human trafficking.

## BUSINESS AND SUPPLY CHAIN

The majority of the Crick's third party spend (c.80%) is mostly concentrated across ICT, scientific equipment, services and consumables as well as facilities and infrastructure. These areas pose the greatest area of modern slavery risk due to volumes purchased and the complexity of the upstream supply chain. See figure 1 below.

Scientific Equipment, Services and Consumables	Facilities and Infrastructure
<ul style="list-style-type: none"> <li>• Consumables and chemicals</li> <li>• Scientific equipment</li> <li>• Instrument Maintenance Services</li> <li>• Personal protection equipment and clothing</li> <li>• Scientific Services</li> </ul>	<ul style="list-style-type: none"> <li>• Hard FM Services</li> <li>• Soft FM Services</li> <li>• Logistics Services</li> <li>• Laboratory gases and equipment (supply and installation) Maintenance</li> <li>• Major and Minor Works</li> <li>• Office Furnishings</li> </ul>
Professional Goods and Services	ICT Equipment and Services
<ul style="list-style-type: none"> <li>• Media Services</li> <li>• Financial services including banking and audit</li> <li>• Insurance Services</li> <li>• Legal services</li> <li>• Office Supplies and Equipment</li> </ul>	<ul style="list-style-type: none"> <li>• Audio visual equipment and services</li> <li>• IT Hardware</li> <li>• Software (Corporate and Scientific)</li> <li>• Networking equipment and services.</li> <li>• Cloud Storage and Computing services.</li> <li>• Print Solutions</li> </ul>

Figure 1 - Spending Categories as managed by the Crick Sourcing Team

The Crick Sourcing Team, in cooperation with departmental leads, actively manages c.70 Tier 1 suppliers under its Supplier Relationship Management ('SRM') framework. This includes regular review meetings, performance monitoring and a periodic refresh of standard due diligence compliance information and documentation. The contractual relationship with these suppliers is generally direct although, where appropriate, we also utilise consortia-led framework agreements through our membership of the [London Universities Purchasing Consortium](#) (LUPC). Our LUPC subscription also grants access to the various materials, training opportunities and partnerships available to assist in making progress against our modern slavery objectives.

## Crick Policies and Procedures

### Our approach

We consider the risk of modern slavery in our institute and supply chain to be low, however we recognise that we have a role to play in tackling modern slavery. The Crick is committed to acquiring goods and services without causing any harm to others and our zero tolerance approach is supported by policies which are communicated to all our employees, contractors and suppliers.

Our sourcing policy stipulates a list of duties for Crick staff to comply with when undertaking procurement activities. Fully managed services contracts include a section on anti-slavery as a standard clause. We also highlight the need to consider the potential for modern slavery risks within individual purchases and, as part of the 2023-2024 policy review, will consider whether it should be more explicit.

We take a multifaceted approach to modern slavery and will review our [Code of Conduct](#) and policies that are most relevant to our zero tolerance approach to modern slavery and human trafficking.

These include:

- Facilities and infrastructure policies
- Finance, grants and sourcing policies
- People policies
- Safety, health and sustainability policies

with particular focus on our safeguarding, whistleblowing, recruitment and selection and sourcing policies.

## DUE DILIGENCE

### Grants and Commercial - Assessing the Risks Associated with Partnering with Funders

The Crick participates in a number of strategic partnerships, receives funds from philanthropy and grant givers, and has commercial operations. Each of these areas contain risks, which, although minor in comparison to the supply chain, must be identified and managed. Each responsible function runs its own due diligence processes and we will review them in 2023-2024 to ensure that they appropriately address modern slavery and human trafficking.

### Sourcing - Assessing the Risks Associated with Spend Categories

Prospective suppliers are required to complete a standard due diligence questionnaire which contains a specific section on modern slavery. This is checked at the point of submission for any compliance requirements.

With the implementation of the Crick's new Strategic Sourcing Platform (provided by Medius) in 2022-2023, the Sourcing Team is in a better position to manage the data required to assess the Crick supply chain and the inherent risks of modern slavery within. The SRM functionality of the system is due to be active from September 2023. This will allow the Sourcing Team to automatically request updated compliance information from the supply base for a more targeted information gathering on key areas.

In 2022-2023, the key Tier 1<sup>1</sup> suppliers were identified and will be approached during 2023-2024 to provide additional information in relation to Environmental, Social and Governance ('ESG') matters including modern slavery (see Objective 1). The primary area of focus will be on the origin of products and services. This will be updated as we receive information from our supply chain and as the supply chain evolves.

Figure 2 draws upon desk-based research and information from the LUPC Modern Slavery statement. It represents an initial assessment of the countries of origin of producers and services, by category, that are provided to the Crick. The data are based on product checks, checks on suppliers' modern slavery statements and other information gathered in procurement processes or supplier discussions. This will be built-upon in 2023-2024 using our SRM process and targeting of our key Tier 1 for more enriched information.

Category	Country
Scientific Consumables and Chemicals	Canada, China, France, Indonesia, India, Malaysia, Mexico, Netherlands, Pakistan, Poland, Thailand, UK, USA
IT Hardware, Networking Equipment and Print Solutions	Brazil, Cambodia, China, Czech Republic, Germany, India, Indonesia, Ireland, Israel, Japan, Laos, Malaysia, Mexico, Netherlands, Philippines, Poland, Singapore, South Korea, Taiwan, Thailand, UAE, USA, Vietnam
Scientific Services including maintenance services (on & off-site)	France, Germany, Japan, UK, Ukraine, US
Soft Facilities Maintenance Services (Cleaning, Security etc.)	UK

<sup>1</sup> Key Tier 1 suppliers in the context of the Crick are suppliers we directly conduct business with and constitute a higher than average risk due to either high level of spend or the specific category of spend.

Office Supplies and Equipment & other non-scientific goods	Austria, Belgium, China, Estonia, France, Germany, India, Indonesia, Ireland, Italy, Japan, Norway, Poland, Philippines, Sweden, UK, USA
Office and Laboratory Furnishings	Poland, Republic of Ireland, UK, USA
Construction and Design Works	UK

Figure 2 - Categories of Spend and Country of Origin of Products and Services provided to the Crick

### Electronics Watch Affiliation

Through our membership of the LUPC, we are affiliated to the NGO [Electronics Watch](#), the collaborative organisation monitoring global electronics supply chains. LUPC joined as a founder member of Electronics Watch in 2014. In 2018, the LUPC Board approved affiliation on behalf of all full LUPC members including the Crick.

### OBJECTIVES FOR 2023-2024

Objective	Action	Commentary/Output
<b>Supplier Engagement</b>		
1	<b>Encourage suppliers to undertake a Supply Chain Evaluation</b>	<p>a) We will assess available tools to identify the most appropriate mechanism to gather information on our suppliers' supply chains and associated human and labour rights risks. If no tool exists, we will look to create a bespoke tool to evaluate our supply chain.</p> <p>b) We will seek to implement the tool for our key Tier 1 suppliers in 2023/2024, subject to the suitability of available tools.</p>
2	<b>Encourage suppliers to sign up to the Sustain Code of Conduct</b>	<p>We will encourage suppliers to sign up to the Sustain Code of Conduct (which reduces the risk of modern slavery) either as part of any competitive procurement process or via the SRM process.</p>
<b>Internal Processes and Policies</b>		
3	<b>Responsible Sourcing Policy</b>	<p>Incorporate the draft Responsible Sourcing policy, which covers ESG risks and issues with the Sustainability strategy, into the Sourcing policy.</p> <p>Following Board approval of our Sustainability Strategy, the Responsible Sourcing policy, including modern slavery requirements, can be completed (see 2022-2023 objectives above).</p>
4	<b>Policy Review and Update</b>	<p>a) We will review and identify policies that need a specific element to recognise modern slavery and human trafficking risks.</p> <p>b) We will support policy leads to add statements/actions when reviewing policies.</p> <p>Policy reviews will incorporate, as standard, consideration of modern slavery and human trafficking risks.</p>

5	<b>Legal Framework</b>	<ul style="list-style-type: none"> <li>a) We will review standard terms and conditions of Crick contracts.</li> <li>b) We will update standard terms and conditions to incorporate ESG risks including modern slavery, as appropriate.</li> </ul>	<p>The Sourcing and Legal teams will continue work in 2023-2024 to ensure that all ESG risks including modern slavery are appropriately covered in our standard terms and conditions to enable meaningful engagement beyond the statutory minimum.</p>
6	<b>Staff Awareness and Training</b>	<ul style="list-style-type: none"> <li>a) We will work with HR to develop and promote training for staff with responsibility for purchasing goods and services on behalf of the Crick to raise awareness of modern slavery and other human rights risks in the supply chain.</li> <li>b) We will become a member of Unseen, a UK charity that raises awareness and educates organisations, statutory agencies, schools and businesses on modern slavery.</li> </ul>	<p>The training will build on training provided to Sourcing and Legal teams in 2022-2023.</p>
7	<b>Internal Stakeholder Group</b>	<ul style="list-style-type: none"> <li>a) We will form a cross-functional, internal stakeholder group to review and manage areas of organisational risk in relation to modern slavery and human trafficking.</li> <li>b) We will investigate and recommend a formal reporting method.</li> </ul>	<p>Once agreed, there will be an ongoing programme publicising the reporting method across the Crick community, emphasising its links to other policies, e.g. safeguarding.</p>

To see all previous Crick statements, visit this [link](#).

This statement has been approved and published by the Crick Board of Trustees on [INSERT DATE] and will continue to be reviewed annually.