

## Modern Slavery and Human Trafficking Statement 2019

**Cowater International:** With over 800 projects implemented in more than 80 countries, Cowater International is a leading international development consultancy firm. Our mission is to contribute tangibly to overcoming the challenges facing developing and emerging economies from a social, economic and infrastructure perspective and support inclusive, sustainable growth for all. After more than 35 years in operation, Cowater has established itself as a leader in state modernization, promoting economic growth, ensuring gender equality and respect for the environment.

Cowater has developed a reputation of excellence for our strong commitment to working collaboratively with clients and stakeholders to provide international best-practice technical assistance, tailored to the context of the institution and country in which we operate. We possess internationally recognized and award-winning experience at the policy, programme and project-level; developing and managing major programme and project initiatives, as well as undertaking more targeted studies, capacity building, and communications activities.

Since its inception, Cowater has earned a reputation for excellence and has built a culture based on integrity, trust, teamwork, performance, and accountability. At the heart of our reputation are the core values that guide our daily actions. We uphold the highest standards of ethical and professional behaviour to enable the Cowater family of companies to continue to implement excellent client-focused projects.

**Our Global Footprint:** Cowater is a global company with its headquarters in Ottawa, Canada, and offices in Montreal (Canada), London, (UK), Pretoria (South Africa) and Nairobi (Kenya). Additionally, the company operates project offices worldwide in countries including, among other locations, Barbados, Burkina Faso, Cambodia, Cameroon, Ethiopia, Indonesia, Jordan, Malawi, Mali, Morocco, Niger, Pakistan, Peru, Senegal, Vietnam, the Occupied Palestinian Territories, and Zambia.



**Our Organisational Structure:** Cowater is a privately-owned company. The Executive Team which is composed of the President & CEO and Divisional leaders, is responsible for setting and reinforcing our culture of project excellence, ethical behaviour, and compliance. The Executive Team is accountable for setting our ethical standards through our Code of Business Conduct and reinforce the values and standards it covers. The Operating Committee which is composed of the Executive Team and their direct reports, are responsible for prevention, communication and risk management in all projects.

**Our Code of Business Conduct:** The Cowater Code of Business Conduct is an important part of our business culture and operations and also an important part of our governance structure, foundational to our business processes and relevant to all aspects of the work that we do.

All who work with us are asked to adhere to the Code of Business Conduct and policies and to understand the way to engage with and represent us. Our **Anti-slavery and Trafficking Policy** is a critical part to the Code of Business Conduct.

Upon engagement with Cowater all staff and suppliers (employees, local project staff, consultants) are required to acknowledge their commitment to the Code of Business Conduct and our employees participate in a discussion session on all topics it covers. Thereafter, yearly our employees are required to re-sign their commitment to the Code of Business Conduct. It is every staff's responsibility to participate fully in discussions related to the Code of Business Conduct, to seek to understand and ask questions about the Code of Business Conduct and related policies. In addition, staff are required to promptly report any incidents or concerns may it be through line management or via our confidential Whistleblower form on our website.

**Related Applicable Policies to the Anti-Slavery and Trafficking Policy:** Cowater is committed to the highest ethical and professional standards. As a company, we conduct business with honesty, integrity and in compliance with all applicable laws. We have developed and implemented the following key best practice policies to ensure we meet and often exceed our statutory obligations. They further support our strong position against modern slavery and human trafficking.

**Anti-slavery and trafficking:** As a global development organization, our projects require us to mobilize staff, source equipment, allocate resources and maintain operations in very difficult working environments. We recognize the risks of human trafficking and modern slavery in our supply chains. We ensure anti-trafficking and slavery principles are upheld. Cowater prohibits all Company staff, anyone who represents the interests of the Company anywhere in the world, and any entity within the Company's supply chains from engaging in slavery and human trafficking.

- The prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us or on our behalf. Staff must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Business Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organization to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organizations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

**Safeguarding:** Cowater is committed to ensuring the safety and welfare of all individuals either delivering or benefiting from its projects. Cowater has a moral, ethical and legal responsibility to its personnel, beneficiaries and clients to ensure that it upholds a zero-tolerance approach to sexual exploitation, abuse and harassment. We investigate such incidences promptly and thoroughly and take firm disciplinary action accordingly.

**Child Protection:** Our company is committed to ensuring that its services, activities and operations are conducted in a manner that upholds the international principles of child protection and children's rights in accordance with the UN Convention on the Rights of the Child. We protect children from exploitation and abuse in the implementation of projects that involve working with children and/or contact with children.

**Duty of Care:** Cowater is committed to the legal and ethical obligation of "Duty of Care", ensuring that our personnel (including our employees, sub-contractors or agents) and other parties are ensured a reasonable standard of care is provided to prevent foreseeable harm. Cowater actively takes responsibility for the safety and well-being of our personnel, and any third parties affected by our activities, including appropriate security arrangements. Cowater achieves this through applying Canadian, our client's or relevant national health and safety laws.

Cowater's Duty of Care goes beyond simple compliance, with an ability to conduct International Organization for Standardization (ISO) 31000 standard Security Risk Assessments (SRAs) to develop comprehensive, intelligent and value for money safety and security risk management systems. Cowater's risk management capability has been critical in our success in implementing projects globally, including in fragile and unstable environments, while ensuring our personnel's safety and security.

**Do No Harm:** Cowater recognises that care should be taken to ensure that any aid investment does not lead to environmental, social or economic impacts, that ultimately undermines their results. In addition, we ensure that any of our activities protect the health, welfare and livelihoods of people and communities affected, including women, children, vulnerable peoples and indigenous peoples.

**Gender and Social inclusion:** Cowater is firmly committed to advancing gender equality and the empowerment of women and girls, while practicing and promoting non-discrimination of all kinds. We are taking numerous steps to support gender equality and social inclusion across all of our projects and operations. We support the promotion and achievement of equality between girls and boys, men and women, irrespective of sex, age, religion, race, ethnicity, sexual identity, economic status, or ability/disability.

### Our commitment in action in 2019

- In 2018, Cowater invested in two new key positions to oversee our people, culture, safeguarding, risks and security: VP People and Culture and VP, Risk and Security.
- We revamped our policies and procedures related to Safeguarding, Duty of Care and “Do no Harm”. The goal was to ensure that all of our policies and procedures on these topics were properly adapted to the current world realities and our growing footprint.
- We enhanced internal capacity in identifying and reporting incidence of modern slavery and human trafficking through the development of a new Awareness training. These sessions were rolled out to all our current employees and new projects. Our Awareness sessions cover all topics addressed in our Code of Business Conduct including our Anti-Slavery and Trafficking policy and related policies. We placed a significant emphasis on the importance of reporting all concerns promptly and via the proper channels to ensure prompt investigation and action on behalf of the company.
- We developed a new Supply Chain Code of Conduct which clearly asserts Cowater’s value and reinforces our Company’s position on Anti-Slavery and Trafficking including the reinforcement of our policy and our reporting process. All new contracts issued to third-party suppliers, vendors, consultants, and grantees (“contractors”) require compliance to the ethical and compliance standard described in the Supply Chain Code of Business Conduct.
- We enhanced our internal and external reporting on ethical/business misconduct in an effort to promptly assess and mitigate against business conduct risks in general and more specifically the risks of modern slavery and trafficking.

During the year in review, **we have had no reported incidents relating to modern slavery and human trafficking.** We have, as noted above, adopted a continuous learning and improvement approach to our policies, procedures and activities. We are committed to continue with this approach in the current and upcoming years to enhance and strengthen our organizational strategies and controls.



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