

## **Balloon Modern Slavery and Human Trafficking Policy**

Although Balloon is not legally required to issue an annual statement under the Modern Slavery Act 2015 (UK); we are committed to complying with the principles enshrined in the Act. We work to ensure that slavery and human trafficking are not taking place in our supply chains or in the businesses we support in East Africa. We have a zero-tolerance approach to modern slavery and human trafficking.

## **Balloon Ventures Structure, Business and Supply Chain**

Balloon Ventures Ltd is a limited company registered with Companies House. It is part of a charitable group headed by Balloon Ventures Foundation Ltd. Which is also registered with Companies House and with the Charities Commission.

Policies and processes apply across the group. The term "Balloon" or BV is used in policy documents to denote the whole group.

We are led by a board of directors/Trustees.

Balloon recruits, trains and invests in small businesses in Kenya and Uganda that have the potential to grow and create good jobs. Our mission is to create decent, sustainable jobs in partnership with the businesses we support.

Our supply chain consists of businesses we support through loans and training.

We have no physical assets

Balloon sometimes runs programmes through local and international volunteers. All staff, volunteers and business owners we work with are over 18.

We appreciate that we work in countries that have high levels of poverty and often weak governance structures to identify incidents of modern slavery. BV must therefore be extra vigilant in ensuring that modern slavery and human trafficking does not happen in our programmes or in the businesses we support.

## **Policy and Approach**

In order to identify actual or potential modern slavery or human trafficking activities we have developed policies especially relating to due diligence, guidelines for staff, training and monitoring.

The following policies and practices are relevant in complying with our commitment.:

- Safeguarding and Child Protection.
- Anti-Bullying.
- Code of conduct for staff and volunteers
- Code of conduct for businesses we train and support.
- Risk management
- Whistleblowing
- Equality and Diversity
- Corporate and social responsibility.
- Staff handbook and Induction training.
- Due diligence approaches to finding and working with businesses.

## **Due diligence, risk and mitigations.**

Balloon has a well-documented, rigorous and detailed due diligence process which every business goes through. This requires our staff to follow a format/checklist and see and talk to staff in the enterprise. We will not work with any business that has unacceptable practices and we will report them if we identify incidents.

During due diligence we identify gaps in good practice and business owners agree a pathway to improvement. This is detailed in the business plan for that company which we monitor and assess regularly.

All businesses prior to investment and Balloon's technical assistance must read and agree a Code of Conduct called Corporate and Social Responsibility

Our staff visit the premises weekly to discuss progress, give assistance and see and talk to staff in the business.

The due diligence is backed by training for staff and a performance management framework.

Managers supplement routines will spot check to businesses through unannounced visits.

We encourage staff and others to use our whistleblowing line should they see or suspect an incident if they are unsure about reporting incidents openly. We act immediately on incidents that come through the whistleblowing line.

### **Related policies**

- Safeguarding and Child protection
- Whistleblowing
- Anti-Bullying
- Code of Conduct
- Anti-Fraud, Bribery and Corruption
- Modern Slavery and Human Trafficking
- Sexual Harassment and Assault
- Equal Opportunities and Diversity
- Health and Safety
- Induction training.

### **Reviews**

All documents are reviewed annually at the same time

Policies apply to the Balloon group of companies

Last Annual Update December 2019