

Modern Slavery

Statement

2024/25

THE
FRANCIS
CRICK
INSTITUTE



Introduction

At the Crick, our mission is discovery without boundaries; to carry out world-class discovery research to understand how living things work and to drive benefits for human health.

We recognise that we have a role to play in helping to identify, prevent and mitigate the risk of modern slavery, human trafficking and forced labour through our activities.

We are committed to greater transparency in our supply chains and have an obligation towards people working within them.

In 2024-25 we continued the rollout of effective due diligence activity with those we work with to help safeguard against human or labour rights abuses taking place within our institute or the organisations supplying goods and services to us.

This statement covers our approach to reducing the risk within our supply chain, including the key activities we are pursuing, and tracking of progress against our agreed objectives.

These procedures are the subject of ongoing review to ensure that we learn and improve over time.

Our structure, governance and management

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

Board of Trustees

Governs the institute and is 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.

Executive Committee

Led by Sir Paul Nurse, for the reporting period, and by Professor Edith Heard from September 2025, the Executive Committee 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 chains and ensuring there are appropriate safeguards in place in our relationships with suppliers and relevant third parties.

In 2024-25, work on modern slavery was principally led by the Sourcing team with support from the Legal and Governance team, Sustainability and Facilities and Infrastructure teams.

Our approach

We consider the risk of human and labour rights abuses in our institute and supply chains to be low. However, we recognise that we have an important role to play in identifying and supporting prevention of such risks through our activities.

The Crick is committed to acquiring goods and services without knowingly causing any harm to others. Our approach is supported by policies, which are provided to employees as part of a comprehensive induction programme, training and ongoing communication updates, and to suppliers and third parties via their contracting and supplier onboarding processes.

Our people

Crick staff are located at The Francis Crick Institute in Central London for the majority of their working time.

As such, they are at a low risk of human and labour rights abuses.

All staff at the Crick are paid at a minimum, the London Living Wage¹, following our accreditation by the Living Wage Foundation. Additionally, the Crick is the recipient of the Athena SWAN Bronze award² in recognition of our work to support equality of opportunity and promotion of diversity across the organisation. This was successfully renewed in March 2025.

The Crick also has an Equality, Diversity and Inclusion strategy³, which drives the creation and support of internal staff interest groups and specific workplace policies⁴ to ensure staff enjoy a safe, diverse and inclusive working environment.

Service Partners, Partner University Researchers and Commercial Partners may be located at other sites such as universities or third-party work sites unrelated to the Crick for a proportion of their working time. These organisations have undergone the Crick's risk based due diligence checks.

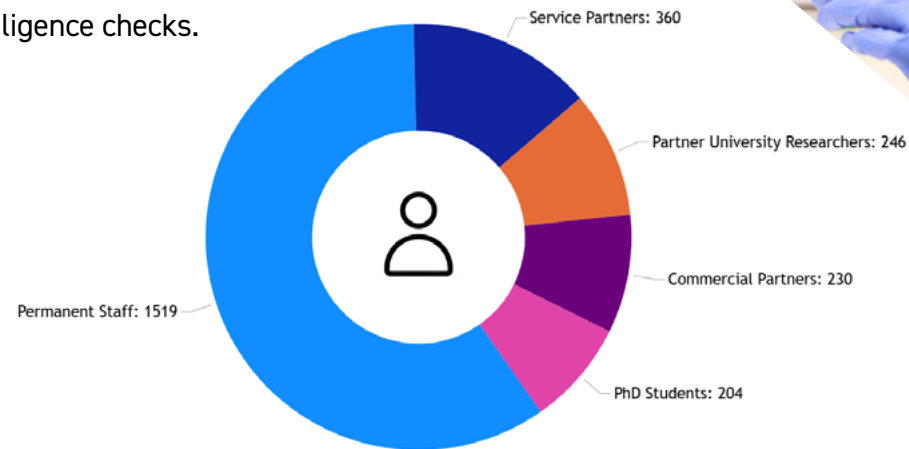


Figure 1 - Crick staff split by worker groups

1. <https://www.livingwage.org.uk/>
2. <https://www.crick.ac.uk/about-us/our-approach-to-science/equality-diversity-and-inclusion/athena-swain>
3. <https://www.crick.ac.uk/sites/default/files/2023-12/Inclusion%20strategy%20High%20res.pdf>
4. <https://www.crick.ac.uk/about-us/equality-diversity-and-inclusion>

Our policies

Our Code of Conduct and policies set the standards for everyone working at the Crick. In 2024-25, policies most relevant to our approach to human and labour rights risks were updated to include wording on human and labour rights risks.

Our policies are signposted to new starters during induction and remain accessible through our intranet site for all staff, including our partners.

The Crick Code of Conduct

The Code of Conduct sets the standards for everyone working at the Crick and outlines the expected behaviours required to align with the Crick's values and vision. It also provides links to the Crick's 10 Key Policies, which include:

Health and Safety Policy

Dignity at Work Policy

Equality, Diversity & Inclusion Policy

Whistleblowing Policy

The Crick Sourcing Policy (internal)

This policy governs how the Crick procures goods and services and provides instructions to Crick staff on compliance when undertaking procurement activities. It also encompasses Responsible Sourcing and the duties of staff to ensure that sustainability and social considerations, including human and labour rights risks, are carefully weighed up in purchasing decisions.

Our supply chain

The majority of the Crick's purchases encompass Science, Facilities and Infrastructure (F&I) and ICT related goods, equipment and services. As far as human and labour rights are concerned, these spend categories pose the greatest risks due to the volumes purchased and the complexity of the upstream supply chain. Our supplier spend is highly concentrated with c.90 suppliers responsible for 80% of our spend. Therefore, our collective efforts are concentrated on closely monitoring these particular suppliers for compliance.

Figure 2 illustrates the distribution of spend within each category.

Expenditure involving collaborative partners is classified as non-addressable spend and is not subject to oversight by the Sourcing team. However, the

Grants team conducts due diligence on these organisations to ensure that any unsuitable association or potential reputational damage is identified and mitigated.

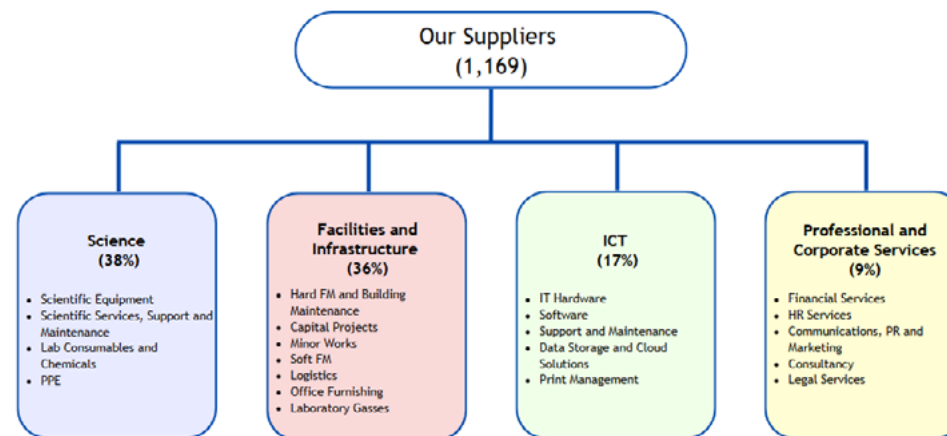


Figure 2 - Distribution of spend by spend category

Due diligence

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

The Crick participates in several strategic partnerships, receives funds from philanthropic organisations and grant givers, and pursues commercial operations. Each of these activities carries risk which, although minor in comparison to the supply chain, must be identified and managed.

The Grants Compliance function manages the Research Collaboration Review policy that incorporates a Due Diligence review assessing partners (funders and documented scientific collaborators) for potential reputational, financial, compliance and national security risks. Once a partner has been assessed they pass through a formal approval workflow (including routes of escalation where necessary) that, in a majority of cases confirms approval to proceed, but in some cases may propose risk mitigation actions or, in very exceptional circumstances, prohibit further engagement with the partner.

Sourcing - Assessing Supply Chain Risks

Prospective suppliers are required to complete a series of due diligence questions on our e-sourcing platform, which contains a specific section on modern slavery. This is checked at the point of submission for any compliance requirements. Any new suppliers, at the point of onboarding to the Crick's finance system, are also requested to confirm that they were not convicted of using child labour or of any other forms of human trafficking.

Additional regular checks are being performed by Sourcing on any new or existing suppliers who may carry the greatest risks within their respective supply chains.

Since 2024, the Crick has requested key suppliers to sign up to the Sustain Supply Chain Code of Conduct, which is now included in our supplier onboarding process with take-up being monitored and reported against.

Key activities

Supplier Relationship Management (SRM)

The Crick Sourcing Team, in collaboration with departmental leads, actively manages approximately 50 key Tier 1 suppliers under our comprehensive SRM programme. The approach differs depending on the supplier but typically includes regular review meetings, performance monitoring, occasional supplier site visits and a periodic refresh of standard due diligence compliance including human and labour rights. 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 grants access to the various contracts, materials, training opportunities and partnerships available to assist with our supply chain activities including managing human and labour rights risks. The LUPC also promote the Supply Chain Code of Conduct with their suppliers.

Appendix 2 sets out the countries of origin of goods and services provided to the Crick.

Electronics Watch Affiliation

Through our membership of the LUPC, we are affiliated with [Electronics Watch](#), an NGO responsible for monitoring global electronics supply chains. This gives us access to specialist information and resources not available elsewhere. We have further enhanced this relationship by supplying information on products that we purchase, enabling Electronics Watch to provide targeted information on areas of risk within our specific supply chain.

This initiative will be reviewed regularly and updated with new suppliers and products as part of our business as usual SRM process.



Our progress and 2025/26 financial year objectives

Objective	2024/25 Target	Progress	2025/26 Target
Theme A – Supplier Engagement			
A1	Increase the number of Tier 1 suppliers undertaking enhanced due diligence as part of our SRM programme to 50 (28 additional)	A Sustainability assessment has been conducted for 50 of our Tier 1 suppliers as part of our Supplier Relationship Management (SRM) programme including ethical labour and social aspects.	Refresh the Tier 1 supplier list and request updated due diligence information for continuous assessment of perceived risks Potentially augment the Top 50 list to include new suppliers based on spend or risk.
A2	Increase the number of suppliers who have agreed to abide by the Sustain Supply Chain Code of Conduct and engage with those who signal otherwise	The Sustain Supply Chain Code of Conduct has been adopted within our Sourcing Rfx documentation and standard due diligence questions. To date c10 Tier 1 suppliers have confirmed compliance but we suspect the number to be much higher, which will be validated at the next due diligence refresh.	50% of Tier 1 Suppliers signed up to the Code of Conduct by 31 st March 2026
A3	Consider adoption of third-party supply chain/risk management reporting tool and implement it within the period	Multiple options have been reviewed and market engagement has taken place. However, this has been paused until the new Sourcing portal is fully implemented in FY25/26.	Finalise the decision and implement the agreed tool by 31 st March 2026 if the cost-benefit of the proposed solution is justified
A4 **NEW**	**NEW**	**NEW**	Conduct 6 supplier site visits covering the standard audit questionnaire by 31 st March 2026

Objective	2024/25 Target	Progress	2025/26 Target
Theme B – Internal Policies & Processes			
B1 (was 4)	Spread awareness of the Sourcing policy at key sustainability events throughout the year	Members of the Sourcing Team were available at the Crick Sustainability Day with a stand promoting all aspects of our responsible sourcing initiatives. The team have also participated in Crick-led activities and have attended events run by external bodies	Attend the 2025 Crick Sustainability Day and other staff engagement activity related to responsible procurement together with the 2025 annual MRC Sustainability Conference in Edinburgh
B2 (was 5)	Continuous review of policy framework to include human and labour rights risks	7 Crick policies, as well policy guidance have been updated throughout the period to include instructions on considering labour and modern slavery risks when amending or drafting policies.	The Sourcing Policy is due for renewal in December 2025. Any new or emerging legislation and best practice will be considered accordingly.
B3 (was 6)	Roll out updated core terms and conditions including specific modern slavery clauses in 2024/25	Crick standard terms have been updated to include appropriate wording	Transition to business as usual and monitor best practice for appropriate changes to core terms
B4 (was 7)	Modern Slavery training programme will be rolled out to additional cohorts of staff	e-Learning was rolled out to a further cohort including the People, Facilities and Infrastructure (F&I) and Legal teams. 124 members of staff have now completed the training	The training programme will be rolled out to additional cohorts of staff with day-to-day involvement in purchasing activities. Target of 200 staff to have passed the training by 31 st March 2026
B5 (was 8)	Publicise the Speak-up campaign and any other relevant forums for whistleblowing and disclosure across the Crick community	Communications have been sent to link the whistleblowing service to logging concerns relating to Modern Slavery in addition to signposting staff to the Sourcing Team	Repeat communications to all staff at least annually and participate in any other staff engagement activity relevant to responsible procurement

Approval

This statement has been formally approved by the Crick Board of Trustees and signed on their behalf.



Lord Browne of Madingley
Chair
The Francis Crick Institute

A blue ink signature of Lord Browne of Madingley.

26 September 2025



Professor Edith Heard
Director
The Francis Crick Institute

A blue ink signature of Professor Edith Heard.

26 September 2025

Appendix 1 – Indicators for measuring progress

The table shows our key performance indicators (KPIs) used to measure the success of our approach to managing human and labour rights risks within our supply chain.

Indicators	Achieved 2023/24	Target 2024/25	Achieved 2024/25	Target 2025/26
Total number of Crick staff completed the online "Introduction to Modern Slavery" learning module	27	100	124	200
Number of key Tier 1 suppliers ¹ undertaking enhanced due diligence as part of our SRM programme	22	50	50	55
Percentage of key Tier 1 suppliers signed up to the Sustain Supply Chain Code of Conduct or equivalent	N/A	90% ²	20% ²	50%
Number of Supplier Site Visits ³	5	10	4	6

¹ Top 50 suppliers responsible for c70% of total addressable spend

² Revised following supplier engagement

³ Site visits might be undertaken by Sourcing, departmental leads or contract owners and typically focus on FM suppliers

Appendix 2 – Country of origin of our key products

Spend Category	Country
Scientific Consumables and Chemicals	Canada, China, Estonia, France, Indonesia, India, Latvia, Malaysia, Mexico, Netherlands, Pakistan, Poland, Ukraine, 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 and off-site)	France, Germany, Japan, Latvia, UK, Ukraine, USA
Soft Facilities Maintenance Services (Cleaning, Security etc.)	UK
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

Appendix 3 – A summary of site visit activity in FY24/25

A total of 4 site visits were carried out in the 2024/25 financial year by representatives of the Sourcing and F&I teams.

There was a focus on our F&I suppliers due to the location and risk profile of the Crick supply chain. Although the IT Supply Chain also presents risks, it is managed using our affiliation with Electronics Watch, who pass us information relevant to the products that we routinely purchase. This includes flagging identified issues within the supply chain of Crick suppliers and updates on what steps are being taken to mitigate any risks. Remedies are always focused on improving the situation for workers on the ground rather than looking to penalise the companies involved.

To ensure a consistent approach, a standard audit questionnaire was devised and agreed upon with Crick leadership to identify if the basic standards relating to labour rights, health and safety and other compliance matters were being met by our suppliers. An example of this is ensuring that employees have received written contracts and have access to training appropriate to their roles. There are two sections in the document: the first dealing with the employment practices of the company and the second to confirm this information with individual staff members who are interviewed on a 1-2-1 basis, free from oversight.

During the financial year, we conducted site visits to three logistics partners as well as our second-tier (indirect) laundry supplier. These visits were carried out at various points throughout the year. The process included discussions with both management and frontline employees to ensure consistent messaging, particularly in relation to contracts, wages, and training.

We are pleased to report that no issues, breaches or risks to employment practices were identified during these visits.

Appendix 4 – Crick Template Site Audit Questionnaire

Supplier Name	
Supplier Site Address	
Crick Assessor	
Supplier Representative	
Date	

Section 1 - Supplier Questions

Question	Supplier Response	Assessor Comments
Can you provide us with a draft/template contract for employees?		
Can you provide us with statistics on the number and nationality of employees?		
Can you provide us with a copy of the employee handbook?		
Are health and safety notices available and on display for employees? Are they available in other languages? (n.b. check the response to nationality statistics and your conversations with employees)		
Do they cover hazardous chemicals or other risks?		

Can you demonstrate that employees have all received health and safety training commensurate to their role?		
Can you demonstrate compliance with right to work in the UK requirements?		
Can you demonstrate evidence of the wages paid to employees? Do these meet the London Living Wage or Living Wage (if appropriate)? Is there evidence that employees are required to pay for their own health and safety equipment or accommodation etc?		
Is health and safety equipment including fire extinguishers in good order, within date (if appropriate) and in the correct position?		
Do you have a whistleblowing policy and process? Look for evidence in employee handbook.		
Can we speak to individuals on a 1-2-1 basis?		

Appendix 4 – Crick Template

Site Audit Questionnaire - continued

Section 2 – Employee Questions

(Ensure this is conducted in private and is free from managerial oversight)

Question	Supplier Response	Assessor Comments
Do you receive appropriate training for the role that you carry out? a) Health and safety b) Fire Safety		
Have you got all the health and safety equipment that you require to do your role safely?		
Have you had to pay for any of this equipment?		
Are your wages paid into your own bank account with no deductions (other than tax as appropriate)?		

Do you live in your own accommodation provided by yourself? If living in employer provided accommodation, this should also be audited. Ask employee about i. Living conditions, ii. Payment for the accommodation iii. Freedom to leave the premises.		
Did you receive a contract before starting work?		
Did you receive a copy or were you signposted to, a copy of the employee handbook?		
Did you have to pay an agent or other to gain access to this job?		
Did you have to provide your identity documents (passport etc) as part of your onboarding? If yes, were these returned to you?		
If you had an issue at work such as a health and safety risk or bullying, would you know where to report this? Would you feel safe in doing so?		