FIRST YEAR OF FTSE 100 REPORTS UNDER THE UK MODERN SLAVERY ACT:

TOWARDS ELIMINATION?

Business & Human Rights
Resource Centre

EXECUTIVE SUMMARY

The International Labour Organization estimates that illicit profits from modern slavery reach $150 billion a year. In 2016, 16 million people were victims of forced labour in the private economy. Companies are exposed to modern slavery risks through their own operations and through complex supply chains where manufacturing, sourcing, financing and hiring are outsourced. Risks are particularly high further down the supply chain. The UK Modern Slavery Act (the Act) recognises that every large company has these risks, and requires all companies with an annual turnover of at least £36 million and operating in the UK to report on the action they are taking to ensure modern slavery does not take place in their operations and supply chains. The UK government suggests companies cover six reporting areas in their reports: organizational and supply chain structure, company policies, due diligence processes, risk assessments, effectiveness of measures in place and training (the reporting areas).

This report assesses the action reported by the FTSE 100, the UK's largest listed companies. Findings show there is a welcome cluster of leading companies taking robust action, such as **Marks & Spencer**, **Sainsbury (J)** and **Unilever**, while the majority show a lacklustre response to the Act at best.

How the FTSE 100 responds to modern slavery is important. As some of the largest companies in the world, the likelihood that their operations or supply chains will contribute to modern slavery is high. They have the resources and capacity to significantly improve the lives of those 16 million victims. They can also provide much needed leadership for the 9,000-11,000 companies the Home Office estimates are now required to report under the Act.

Last year, Business and Human Rights Resource Centre released FTSE 100 At the Starting Line: An analysis of company statements under the UK Modern Slavery Act, which assessed some of the first statements published under the Act. Our analysis found that only a handful of leading companies were demonstrating rigorous action while the rest produced weak statements, indicating little action. One year on, we expected companies to have a better understanding of their risks and to be taking action to address them. However, there is still a wide gap that distinguishes a few leading companies from the laggards that make up the majority.

We placed the statements in 10 scoring tiers with 10 being the highest tier and one the lowest. Companies with no statement were placed in tier zero. No company scored in tier 10. **Marks & Spencer** scored top in tier nine and **Sainsbury (J)**, **Unilever, British American Tobacco, Tesco** and **Vodafone** were the other companies in the top three scoring tiers. More than half the companies (52) are in the bottom four tiers. **Hargreaves Lansdown, Paddy Power Betfair, Pearson** and **Worldpay** are in tier one as they provided little or no information in any of the six reporting areas.

Compared with last year, a higher proportion of companies reported positive action on incorporating modern slavery into risk assessments. For example, **Whitbread** conducted an assessment to identify which suppliers and what parts of its supply chain were most at risk of modern slavery. The assessment identified 13 products and services as having a higher risk of modern slavery. More companies are also providing modern slavery training to relevant employees and even suppliers. **Associated British Foods** trained its senior procurement team across all its businesses on modern slavery including risk assessment and how to develop a response plan. Many companies have reviewed existing policies and practices to ensure they are fit for purpose to address modern slavery. **BT** has conducted a review of its human resources processes, due diligence processes, Recruitment Policy, Sourcing with Human Dignity standard, and conducted an equal pay and gender gap analysis.

Improvements were reflected in the scores of some companies. 16 companies published second-year statements, and 10 received higher total scores than last year. In some cases this resulted in the company moving up in the tiering. **SSE** and **United Utilities** moved up two tiers and **Babcock, Experian, Marks & Spencer** and **Vodafone** moved up one tier.

These improvements are encouraging. However, almost half of the companies do not meet the minimum requirements set out by the Act (signed by director, approved by board and available on the company's homepage). The majority of companies do not provide details on the complexity of their supply chains and risks they have identified. Weak performing companies must be held accountable for their performance or there is a risk their efforts will not improve. Holding companies to account is essential to driving up standards, a key step to eradicating modern slavery in supply chains. The status quo renders the Act redundant and allows for modern slavery to thrive - the actions of a small number of leading companies will not compensate for the poor performance by the majority.

Key findings:

- The highest performing companies are **Marks & Spencer, Sainsbury (J), Unilever, British American Tobacco, Tesco** and **Vodafone**. These leaders explained the risks identified in their supply chain, including where the risk was identified (sector or location). They also reviewed existing policies and practices, and collaborated with experts and peers to learn best practice and implement these lessons into their own practices. However, no company reached the top tier.

- The companies with statements that demonstrated weak performance are **Hargreaves Lansdown, Paddy Power Betfair, Pearson** and **Worldpay**. These companies provided little or no information in any of the six reporting areas. The majority (69%) of companies are in the bottom five tiers.

- 50 companies provide no meaningful information on whether their actions were effective in addressing modern slavery risks. Companies that did provide information relied heavily on performance indicators and did not indicate whether the results of the data collected from these indicators evidenced their processes were effective. **BT** is one of the few companies that provided detailed information on this reporting area.

- 43% of the companies failed to meet all three of the minimum requirements. Compliance with each of the requirements was patchy: 28 company statements did not explicitly say they were approved by the Board (or equivalent); nine company statements were not signed by a director (or equivalent); and 16 companies did not have a link to the statement on the homepage of the company website

Key recommendations

- **Companies** should:
  - Ensure corporate executives prioritise modern slavery as part of the strategic agenda of the company and support all departments implementing relevant policies and strategies.
  - Collaborate with their peers to investigate modern slavery risks common supply chains through deep-dive research, and share insights to help develop best practice.
  - Raise awareness among their suppliers of modern slavery risks and require them to conduct due diligence in their operations and supply chains.

- **Investors** should engage with companies on their actions to tackle modern slavery and reward companies that demonstrate due diligence to avoid slavery and provide remedy. More information is available in CORE Coalition's briefing, Engaging with Companies on Modern Slavery – A Briefing for Investors.

- **UK Government** should
  - Improve monitoring and enforcement mechanisms to ensure companies that are required to report under the Act feel pressure to comply and are penalised for failing to do so.
  - Publish a list of the companies required to produce statements under the Act and support open, free, and accessible information regarding company compliance.
  - Provide clear incentives for corporate action: bids for public contracts should be dependent on companies demonstrating due diligence in their operations and their modern slavery statements.

TIERING OF STATEMENTS

Tier	Companies
10	
9	Marks & Spencer*
8	Sainsbury (J)* Unilever*
7	British American Tobacco* Tesco* Vodafone
6	Associated British Foods, BT*, Burberry*, Diageo*, Reckitt Benckiser
5	AstraZeneca, Aviva, Barclays*, Barratt Developments, BP, Bunzl, Centrica, ConvaTec*, GKN*, GlaxoSmithKline*, HSBC, International Consolidated Airlines*, Mondi*, Morrison*, Rentokil*, Rio Tinto*, Severn Trent, Sky*, United Utilities*, Whitbread
4	Admiral, Anglo American*, Baillie Gifford & Co Limited[1], BAE Systems, BHP Billiton*, easyJet*, Glencore*, Imperial Brands*, InterContinental Hotel*, Informa, Kingfisher*, Lloyd's Banking*, Merlin Entertainments, NEXT*, Prudential, RELX, SSE*
3	3i*, Antofagasta*, Ashtead, British Land Company, Coca-Cola*, Compass Group, CRH*, Croda, DCC*, Direct Line Insurance, Experian*, G4S*, Hammerson*, Intertek, Johnson Matthey*, Land Securities*, Legal & General, London Stock Exchange, National Grid*, Old Mutual, Rolls-Royce, Royal Bank of Scotland, Royal Dutch Shell, Royal Mail*, RSA Insurance, Sage*, Segro*, Smiths Group, Smurfit Kappa, Standard Chartered*, Standard Life*, Taylor Wimpey*, TUI*, WPP
2	Babcock*, Carnival, Ferguson, Fresnillo, ITV*, Mediclinic, Micro Focus*, Persimmon, Provident Financial*, Schroders, Shire*, Smith & Nephew*, St. James's Place*
1	Hargreaves Lansdown*, Paddy Power Betfair, Pearson*, Worldpay*
0	Rangold Resources[2]

*Companies we assessed as having met the minimum requirements: signed by the director, explicitly approved by the Board and available on the company's homepage. An explanation of the assessment can be found in the Methodology section of this report. Assessment made 10 September 2017.

1. Baillie Gifford & Co. Ltd is the managing company of Scottish Mortgage Investment plc, a FTSE 100 company, which says it is not required to report under the Act. Baillie Gifford & Co. Ltd's modern slavery statement was assessed in its place. A further explanation is provided in the report.
2. Rangold Resources Limited did not publish a statement. We contacted them to request a statement, they did not respond to our request.

INTRODUCTION

Modern slavery[3] is on the rise globally. According to the Modern Slavery Index, compiled by Verisk Maplecroft, risk has increased most in the European Union (EU).[4] Germany and the UK, two of the world's biggest economies, have risen from low- to medium-risk in the Index. An influx of migrants into Europe, a particularly vulnerable group, has contributed to an increased risk in the agriculture, construction and services sectors.[5] No company can assume it has low risks based on where it operates or where its supply chains are located.

Research by the International Labour Organization and the Walk Free Foundation estimates more than 40 million people around the world were victims of modern slavery in 2016.[6] It is inevitable that most companies will have the risk of modern slavery in their supply chains, a fact that is acknowledged by leaders of some of the biggest consumer facing companies.

Business and Human Rights Resource Centre's coverage of modern slavery spans all sectors and corners of the world. Our research on labour rights covers issues such as migrant workers in the Gulf , Syrian refugees in Turkish garment factories, KnowTheChain benchmarks, and FTSE 100 disclosure under the Modern Slavery Act.

Legal Risk in 2016/17:

- In 2016, the UK Department of Justice brought 51 new prosecutions under the Act, more than four times the number in 2015.[7] While these were prosecutions against individuals, cases such as DJ Houghton Catching Services, discussed below, illustrate how the crimes of a few bad apples far down in a supply chain can implicate even the biggest companies.

- Findings of modern slavery can have devastating financial damage for a company. Violations of the Act can cause reputational damage which translates into loss of profits and loss of trust by consumers. A high-profile trafficking case was brought against DJ Houghton Catching Services. This was the first time a British company was found liable for abuses against victims of trafficking. The gangmasters were sentenced to pay a settlement worth more than £1 million in compensation and legal costs for the migrants who were trafficked. These victims, represented by law firm Leigh Day, were part of a national supply chain that produced eggs for some of the UK's biggest retailers including McDonald's, Tesco, Asda, M&S and the Sainsbury's Woodland brand.[8]

- In 2017, two brothers were found guilty of trafficking workers from Poland to work in a Sports Direct warehouse and were jailed for six years each under the Act.[9] This came a year after the company dropped off the FTSE 100 following a scandal around poor working conditions.

3. Modern slavery is a term used to encompass exploitative practices including forced labour, bonded labour, human trafficking and child labour.
4. Verisk Maplecroft is a consultancy which assessed 198 countries for risk of modern slavery. Assessment includes strength of laws, effectiveness of enforcement and severity of violations.
5. https://maplecroft.com/portfolio/new-analysis/2017/08/10/20-eu-countries-see-rise-modern-slavery-risks-study/
6. http://www.alliance87.org/2017ge/modernslavery#!section=0
7. Modern Slavery Prosecutions Multiply in the UK, Supply Chain Dive, Jennifer McKevitt, 6 June 2017, http://www.supplychaindive.com/news/UK-modern-slavery-act-results-2016/444258/
8. Court finds UK gangmaster liable for modern slavery victims, Felicity Lawrence, Guardian, 10 June 2016, https://www.theguardian.com/global-development/2016/jun/10/court-finds-uk-gangmaster-liable-for-modern-slavery-victims-kent-chicken-catching-eggs
9. Brothers Jailed for Trafficking People from Poland to Work at Sports Direct, Rob Davies, 23 January 2017 https://www.theguardian.com/business/2017/jan/23/brothers-jailed-trafficking-poland-sports-direct-shirebrook

UK MODERN SLAVERY ACT

Section 54 of the Act requires every organization with a global annual turnover of £36m or more which carries on a business (or part of a business) in the UK to produce a slavery and human trafficking statement for each financial year. The statement should set out the steps the organization has taken that year to identify and eradicate modern slavery from its business and its supply chain.

Under the minimum requirements of the Act statements must:

a. be published on the company's website, and a link to the statement must be placed in a prominent place on the website's homepage if it has one; and
b. be approved by the board of directors (or equivalent management body); and
c. be signed by a director (or equivalent).

These requirements have a significant effect: approval by the board demands buy-in from the very top for company-wide action to combat slavery risks; a director's (or equivalent) signature creates clear accountability; and availability of the statement from the company's homepage means better accessibility for consumers and investors who want to understand company action.

The Act suggests statements include information on:

a. the organization's structure, its business and its supply chains;
b. its policies in relation to slavery and human trafficking;
c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
e. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; and
f. the training about slavery and human trafficking available to its staff.

METHODOLOGY

This briefing analyses action to eradicate slavery reported by FTSE 100 companies under the Act. Every company required to report under the Act should have produced at least one statement by the end of September 2017. 98 companies in the FTSE 100 have produced a statement. Of these 16 have produced two statements. This briefing is a follow-up to FTSE 100 At the Starting Line, an analysis of statements Business and Human Rights Resource Centre published in October 2016.

Scottish Mortgage Investment Trust did not publish a statement. We contacted the company to request a statement and **Baillie Gifford & Co Limited** responded on its behalf as its managing company. It stated **Scottish Mortgage Investment Trust** does not fall within the scope of the Act and is not obliged to make a statement. The company does not supply goods or services in the normal course of its business as it is an investment vehicle for its shareholders and does not have a turnover.

The company's annual statement says, "In any event, the Company considers its supply chains to be low risk as its suppliers are typically proffesional advisers. A statement by the Managers under the Act has been published on the Manager's website at www.bailliegifford.com."[10] We have assessed the modern slavery statement of **Baillie Gifford & Co Limited**.

Each company was scored on the quality of the action they reported in their modern slavery statement on the six suggested reporting areas in the Act. We also determined whether the statements met the minimum requirements as follows (Assessment made 10 September 2017):

» **Approval** – Statements have to explicitly mention approval by the board or equivalent. Approval cannot be delegated by the board to an individual such as a board member or director.

» **Signature** – Statements have to demonstrate ownership by an appropriate person evidenced by a signature with the name and title of a director (or equivalent). A statement without a signature but with the name and title of an appropriate person met this requirement. A signature alone without a name or title did not meet the requirement.

» **Website** – A link to the statement - clearly indicating it was a modern slavery statement - had to be on the homepage of the company's website, or a link to the statement found on a drop-down menu on the homepage.

We used the same methodology as in FTSE 100 At the Starting Line to analyse the quality of reporting across the six reporting areas. This ensures comparability between the two sets of statements. We used guidance published by the Home Office and CORE Coalition to benchmark company action, as well as our own organizational expertise. The following section of this report includes our findings from each of the six reporting areas.

Both the Home Office and Core Coalition publications provide detailed explanations of why each of the categories is important to understanding, assessing and managing slavery and human trafficking risks in a company's operations and supply chain. They also suggest actions companies should take and information that should be included in statements. We scored reporting on each of the six recommended reporting areas of the UK government from zero to five looking at how much information was provided as well as the quality of the information. Each company could score up to a total of 30 points

Companies that did not have polices or processes in place but stated an intention to develop and implement them were credited for stating intention. Generally, all statements should reflect continued progress and improvement year on year, whether a company is starting from scratch or is already taking steps to address these issues.

Companies were divided into 10 tiers with tier 10 representing a high reporting standard and tier one indicating no, or only cursory, effort. Companies with no statement were placed in tier zero.

Statements and data were gathered from Modern Slavery Registry a free, open and searchable registry of company statements under the UK Modern Slavery Act.

A further explanation of the methodology can be found here. https://business-humanrights.org/en/ftse-100-report-2017.

11. Scottish Mortgage InvestmentTrust plc Annual Report and Financial Statements 31 March 2016 https://www.bailliegifford.com/individual-investors/literature-library/funds/investment-trusts/scottish-mortgage/annual-reports/scottish-mortgage-annual-report-march-2016/

Structure, Business & Supply Chains

1.7
Average score out of 5
(Highest score: 4)

Most companies provided an overview of their business (including whether they have operations outside the UK), providing general descriptions of their services and products, and overall figures on the number of employees, customers and suppliers. However, detailed reporting on supply chains was weak, including on the structure of supply chains and/or what goods or services are sourced and from where (by region or country).

There was little information provided on the type of workforce, such as seasonal workers, or the use of recruitment agencies to hire workers.

Paddy Power Betfair did not provide any information at all.

Example of good practice

In 2016, **Marks & Spencer** launched an interactive supply chain map. The map includes names and addresses of their suppliers and represents over 98% of the company's first-tier manufacturing sites. The map also indicates the presence of a trade union and/or workers committee in a factory where they've been declared, as well as the ratio of male and female workers.

What the **Home Office** says:
A company needs to understand its own supply chains in order to identify risk and report on it. This section of the statement should include the sector(s) the business operates in; whether any of its work is seasonal; the organizational structure and group relationships; the countries it sources its goods or services from including high risk countries where modern forms of slavery are prevalent; the make-up and complexity of the supply chains; the businesses operating model; relationships with suppliers and others, including trade unions and other bodies representing workers.

CORE Coalition, Recommended Content for a Modern Slavery Statement, says:
A company should provide an accurate overview of its operations including its products and services, its suppliers and its countries of operation. A full list of suggested issues include:

- Main products/services/customers
- Company structure and subsidiaries, including outside the UK
- Structure of supply chains
- Location countries of company operations, manufacturing activities and sourcing
- Whether suppliers are engaged seasonally and the percentage of employees on temporary/seasonal contracts
- Internal procedures to ensure adequate procurement pricing, prompt payment and good planning

Policies in Relation to Slavery & Human Trafficking

1.9
Average score out of 5
(Highest score: 4)

Almost a third of companies analysed had a code of conduct or policy in place that addressed expected behaviour of employees on various issues including ethics. However, these companies did not have policies in place that directly relate to modern slavery.

Several companies, including **Coca-Cola, Diageo** and **Direct Line Insurance** aligned their policies with, or were guided by, international standards such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs) or the International Labour Organization's core conventions.

Company performance was very weak on development and oversight of policies, particularly with regard to seeking input and guidance from relevant internal and external stakeholders.

Hargreaves Lansdown and **Pearson** did not provide any information on policies.

Examples of good practice

Unilever has policies in place that explicitly prohibit forced, compulsory, bonded or child labour and human trafficking for its own employees (Code of Business Principles), its suppliers (Responsible Sourcing Policy) and other non-supplier business partners (Responsible Business Partner Policy). They form part of an overall Business Integrity framework used to implement and operationalise the UNGPs.

Vodafone Group has a Code of Ethical Purchasing that every supplier is required to sign. The Code was developed in consultation with employees, suppliers, investors and NGOs, and directly addresses modern slavery. It is overseen by the Group's Chief Financial Officer, who is an Executive Director of the Group and sits on the Group Executive Committee. Development and implementation of the Code is led by the Group Supply Chain Management Director who is a member of **Vodafone's** global senior leadership team.

What the **Home Office** says:
Clear organizational policies demonstrate a commitment to this issue and ensures that appropriate and coordinated action is taken throughout the business. These policies and approaches may need upgrading as the years pass, and as understanding of the issue and approaches to address it improve. This section of the statement should include the process for policy development; Policies that concern business relationships, for example, a Supplier Code of Conduct; Recruitment policy; Procurement policy and incentives to combat modern slavery; Employee code of conduct; Policies concerning access to remedy, compensation and justice for victims of modern slavery; and Polices that relate to staff training and increasing awareness of modern slavery

CORE Coalition, Recommended Content for a Modern Slavery Statement, says:
Policies on modern slavery should specify expectations of personnel, suppliers, business partners and others who are directly linked to business operations, products and services. Policies should be endorsed and signed off by senior management and shared widely, with translations for workers where necessary. Information on the following policies should be included in the statement:

- Policies that concern business relationships i.e. supplier code of conduct
- Recruitment policy
- Procurement policy
- Whistle-blowing procedures
- Migrant labour policies
- Child labour policy
- Child protection policy
- Gender policy
- Supplier code of conduct
- Employee code of conduct
- Policies concerning remedy and compensation for labour rights abuses
- Policies relating to staff training and increasing awareness of modern slavery
- Details of any mechanism by which standards or policies are enforced

Due Diligence Process

2.3
Average score out of 5
(Highest score: 5)

Companies reviewed their own practices to determine whether they may contribute to increasing the risk of modern slavery, such as reviewing their recruitment practices. Companies also made an effort to embed human rights by raising awareness throughout the company including at the most senior levels and among suppliers. This is an improvement on last year, yet many companies continue to focus solely on the management of supplier risk and do so by including modern slavery provisions in questionnaires and/or contracts with suppliers which may not effectively manage supplier risk.

A few companies acknowledge that audits alone will likely fail to identify labour rights abuses and modern slavery risks. These companies report taking a holistic approach which includes emphasis on engaging directly with workers. **Marks & Spencer** takes a more holistic approach to due diligence that includes on-going monitoring and direct engagement with workers.

Kingfisher introduced its Supply Chain Workplace Standards which require suppliers to maintain a grievance mechanism for workers who would not face reprisal, intimidation or harassment. **Severn Trent** also stated in its Sustainable Supply Chain Charter that it expects suppliers to have appropriate whistleblowing procedures in place.

More companies reported participation in industry groups and collaboration with peers to share data and learn best practice. **Sainsbury (J)** participated in several programmes dealing with issues such as migrants and recruitment practices, and slavery and trafficking in he Thai fishing industry. **British American Tobacco** worked with Verisk Maplecroft to develop a due diligence process to strengthen its existing supplier assessment programme and align with the UNGPs. **Anglo American** says through its association with the International Council on Mining and Metals and the South African Chamber of Mines, it is working with peer mining companies to harmonise responsible sourcing approaches, develop a common set of standards and provide consistent messaging on modern slavery to a wide supplier base. **Morrison** participates in collaborations to improve labour standards in the Thai seafood industry.

Paddy Power Betfair did not provide information on due diligence.

Examples of good practice

Centrica formed a Steering Group to develop a modern slavery strategy which is comprised of representatives from relevant group functions. It sets the group standards for modern slavery compliance by its colleagues across the business and is responsible for providing updates to executive management as well as the Board. It is also responsible for the creation of response and escalation plans for both the supply chain and operations, so that in the event of an identified or suspected modern slavery incident **Centrica** can respond in an appropriate and effective manner.

Marks & Spencer raised awareness among its suppliers and franchisees by developing detailed guidance on its requirements related to issues of recruitment fees and passport/identity document retention and how to meet those requirements. The company has also consulted suppliers on a new Global Labour Provider Policy, which it will launch to suppliers in 2017-18.

What the **Home Office** says: The UN Guiding Principles on Business and Human Rights specify that due diligence processes should 'include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. This section of the statement should include actions taken to understand the businesses operating context; Details of risk management processes, including monitoring and evaluation measures; Impact assessments undertaken; Action plans to address and risk/actual instances of modern slavery and how actions have been prioritized; Evidence of stakeholder engagement; Business-level grievance mechanisms in place to address modern slavery; Actions taken to embed respect for human rights and zero tolerance of modern slavery throughout the organization.

CORE Coalition, Tackling Modern Slavery through Human Rights Due Diligence, says:
Human rights due diligence is comprised of the following key steps:
Assessing actual and potential rights impacts that a company's own activities may cause or contribute to; or which may be directly linked to its operations products, or services but its business relationships or supply chains. This requires engaging with internal and external stakeholders, including people who are affected or likely to be affected by a company's activities and the organizations that represent them, ie. NGOs, trade unions and community leaders.
Integrating and acting on the findings by developing clear action plans to prevent and mitigate adverse human rights impacts including modern slavery. Action plans should be developed with input from external stakeholders and may include activities such as training or capacity building for suppliers and employees, as well as a review of business strategies.

Risk Assessment & Management

1.9
Average score out of 5
(Highest score: 5)

Several companies with a risk assessment in place that included a component on modern slavery also identified risks using those assessments. Companies describe how they prioritise focus areas for assessments, to find highest-risk areas such as commodity, sector or region. For example, **Reckitt Benckiser** considered factors including country of operation, commodity supplied, and sector profile, and identified certain supplier groups as high risk: third-party manufacturers, distribution centres and selected raw and packaging material suppliers, predominantly located in Latin America, Middle East, Africa, North and South Asia.

Companies often failed to provide information on next steps taken to address the risks they disclose.

Some companies engaged with external experts to develop and implement effective risk assessments. **Diageo's** assessments involve meetings with employees, union members, factory workers, labour providers/ recruitment agencies, contract workers, NGOs, and other external parties.

Carnival, Ferguson, Hargreaves Lansdown, Intertek, Mediclinic, Paddy Power Betfair, Pearson, Provident Financial, Royal Bank of Scotland, Schroders, Smith & Nephew, St. James's Place and **Worldpay** did not provide information on risk assessment and management.

Examples of good practice

Whitbread worked with the human trafficking charity, Stop The Traffik, to undertake a heat mapping exercise to identify which suppliers and what parts of its supply chain were most at risk of modern slavery. Products and services that were identified as having a higher risk of modern slavery werebeef, contract cleaning, clothing and linens, cocoa, coffee, laundry, palm oil, poultry, seafood, sugar, tea, timber and tomatoes. This included 80 direct suppliers, however the company found the majority of risk to be in the lower tiers of its supply chain. The company is developing its response to the identified risk through conducting individual supplier due diligence, action planning, auditing and root cause analysis.

Tesco gathers intelligence about emerging risks through relationships with NGOs, unions and through groups like the Ethical Trading Initiative and the Consumer Goods Forum. Campaigners and media investigations also play an important role in helping to identify where some of the company's biggest risks lie. Responsible Sourcing Managers across eleven key sourcing countries, all local to their country of operation, gather local intelligence through their own grassroots networks.

Vodafone enlisted an international audit firm to conduct a series of assessments which combined a standard industry assessment with additional enquiries and analysis focused on modern slavery. During the 2017 financial year, this approach was trialed with two suppliers and included on-site worker interviews to evaluate labour rights such as:

- freedom to take breaks during working time;
- freedom to leave at the end of a shift;
- no pay withheld;
- no recruitment fees paid to agencies; and
- no documents withheld.

The company is in the process of reviewing the feedback from these audits and will use this to determine appropriate next steps.

What the **Home Office** says: If an organization has properly assessed the nature and extent of its exposure to the risk of modern slavery, it will be more able to take targeted action to find it, to remedy it, and to prevent it occurring in the future. Modern slavery risk assessments should be seen as part of an organization's wider approach to risk management and could form part of more general risk assessments. Assessments should be able to identify the risks and issues, properly assess their level of importance, and ensure that appropriate remedies are in place. Identifying relevant information from internal and external sources will help businesses to undertake effective risk assessments and appropriate review of those risks.

CORE Coalition, Beyond Compliance: Effective Reporting under the Modern Slavery Act, says:
A human rights impact assessment should examine the company's direct operations, supply chain, and other business relationships in high-risk environments to identify the factors that may create risks to people. A risk assessment or mapping exercise will help determine the level of exposure to the risk of being involved in modern slavery and where that exposure is greatest. Knowing the vulnerabilities in a business to modern slavery will help identify strategic priorities, focus attention and efforts on issues of particular relevance to that business, and develop informed prevention strategies. The assessment should then introduce country-specific data on the risk factors from those geographies where the business's supply chain is based, including the relevant national laws and practices relating to these issues. In the countries of highest risk, the business should conduct stakeholder consultation with potentially affected groups.

Effectiveness

0.8
Average score out of 5 (Highest score: 3)

This is the lowest scoring category in our analysis. 50 companies did not provide any information at all. It may take a year or more to gather information on how effective the company actions are to address modern slavery; many companies will have only just started to develop and implement policies and practices. However, this does not prevent detailed reporting on how a company will assess its practices to determine whether they are effective.

Companies developed key performance indicators that were tailored to their own practices, rather than using generic ones as was apparent in last year's analysis. However, companies continue to report on those indicators (such as number of employees who have received modern slavery training or the number of audits conducted) without discussing whether these measures are delivering effective results for the company. There is no value in tracking the number of people who are trained if the company is not following up to see whether those employees have a better understanding of modern slavery after the training.

A few companies disclosed incidents of forced labour identified through social audits, on-site visits and assessments, and stated that remediation plans were put into place, but did not provide details on those plans.

A small number of companies review whether their practices are effective to address modern slavery risks, and take this information to inform business decisions.

Example of good practice

Reckitt Benckiser identified two non-compliances with its 'No forced labour' clause at its manufacturing facility in Bahrain through an internal review of its operations. The issues concerned the withholding of passports without the consent of sub-contracted labour provided by a third party. The company immediately remedated the case, though did not provide information on how this was accomplished. As this is a common issue faced by companies operating within the Middle East, the company plans to conduct further due diligence of its manufacturing facilities as well as offices located within this region.

Sainsbury (J)'s third party social audit identified mandatory fees that were being paid by migrant workers in its supply chain. The supplier is one of the largest labour providers into the UK food industry, and following engagement by **Sainsbury (J)**, amended its policy on mandatory fees. There were also 17 non-conformances at nine sites identified by third-party audits at suppliers' grocery sites. They were categorised under the "employment is not freely c hosen" clause of its Code of Conduct. All cases were appropriately followed up and remediated. The company did not provide information on how these cases were remediated.

What the **Home Office** says: This section of the statement could include disclosure of any identified instances of modern slavery and of results of any corrective action plans; company-level grievance mechanisms in place, number of complaints made through these mechanisms and their resolution; remedy and compensation provided for labour rights abuses; the publication of any performance indicators used, including detailing if and how business decisions are informed by performance indicators; and evaluations of the effectiveness of training, formally or informally.

CORE Coalition, Modern Slavery Reporting: Weak and Notable Practice, says:

Companies should use this section to describe processes used to identify risk and to detail how effective these are in capturing relevant information on workers' welfare, and to set out their response to incidents of modern slavery. Examples may include investigations into allegations of abuse, capacity building of suppliers, and if necessary the termination of business with unscrupulous contractors. The Modern Slavery Act also encourages companies to benchmark progress against key performance indicators, enabling firms to track their progress in overcoming modern slavery challenges.

Training

1.9
Average score out of 5
(Highest score: 5)

There has been an increase in training on modern slavery being provided to targeted groups in the organization. A small number companies also provide capacity building in the form of guidance or training to suppliers. Approximately a quarter of the companies provided training on a code of conduct or similar ethics training, but did not include a specific modern slavery component.

3i, Croda, DCC, Hargreaves Lansdown, Land Securities, Legal & General, Micro Focus, Paddy Power Betfair, Pearson, Persimmon, Royal Dutch Shell, St. James's Place and **Worldpay** did not include any information on training.

Examples of good practice

In 2015, **Associated British Foods** trained its senior procurement team across all its businesses on modern slavery including risk assessment, how to develop a response plan and auditing. It is now expanding its training programme to the wider buying community within its business, including to those responsible for cleaning and catering, construction and refurbishment contracts. Twinings, one of the branded products in the company's grocery division, are also planning to conduct a workshop with local HR teams which will include a specific session about recruitment practices, working with recruitment agencies and labour contractors. In addition, Twinings has conducted training days for its suppliers aimed at raising awareness and providing guidance about modern slavery, specifically around issues relating to agency labour and document checks for new workers.

Morrison worked with Stronger Together, a multi-stakeholder initiative aimed at reducing modern slavery, to develop awareness workshops and e-learning modules, and actively encouraging suppliers to attend the training sessions they host across the UK. To date over 60% of its food suppliers have attended Stronger Together training, with more than 200 supplier colleagues taking part in 2016. The company plans to continue to host and advocate these workshops in 2017 and intends to widen the scope to include non-food and produce suppliers.

British American Tobacco delivered a series of workshops to both owned and third-party tobacco leaf suppliers across the globe to introduce the Sustainable Tobacco Programme and its specific criteria on human rights and forced labour. The suppliers in turn delivered training to their teams and farmers. The company also provided training and capacity building on human rights issues for its farmers and members of local communities, attended by over 60,000 beneficiaries.

What the **Home Office** says:
Training is a fundamental way of raising awareness and ensuring that people understand the importance of a particular issue. It also helps people to understand what they need to do, and how to work together internally or externally if they encounter something that raises concerns. Training may be targeted at different groups of employees within a business, including leadership, or at different businesses within a supply chain, and the training itself could take a range of different forms. It may range from detailed training courses to broader awareness-raising programmes.

CORE Coalition, Recommended Content for a Modern Slavery Statement, says:

Issues to cover include:

- Specific training sessions on modern slavery, including awareness-raising of the signs of modern slavery and information on how to raise complaints within the company.
- Training of all relevant decision-makers within the company on risks, policies and standards related to modern slavery, human trafficking and forced labour.
- Identification of which suppliers have received training and capacity-building due to the particular risks of their operations.
- Evidence that training has been provided to groups at risk, to make them aware of their rights.
- The frequency of training (i.e. annually) and evaluation of its effectiveness via feedback from participants.

WIDER TRENDS

The FTSE 100 represents some of the biggest companies in the world. These companies have the resources to take rigorous action to identify and address modern slavery in their operations and supply chains. However, our findings show that only a handful of companies highlighted in this report demonstrate leadership. These findings are indicative of the company action that is reported in the over 3,000 statements held on the Modern Slavery Registry. A vast majority of companies are failing to take effective action and must do more to address modern slavery.

There is also a low level of compliance with the reporting requirement. An estimated 9,000 to 11,000 companies are required to report under the Act, yet there are only 3,000 statements on the Modern Slavery Registry. A publicly available list of companies that are required to report would enable stakeholders to monitor compliance with the Act. Such a list would also help achieve a level playing field by allowing stakeholders to determine which companies have and have not complied with the Act. Companies with large and complex supply chains could use a list to monitor their suppliers' compliance with the Act as part of their own due diligence framework.

The Home Office declared that Section 54 is intended to drive up standards and bring about positive change through competition. That competition would be driven through the comparison and benchmarking of statements[10], yet this can only be achieved when investors and civil society know which companies are meant to report so that they can be scrutinised.

Companies should embed modern slavery into a broader human rights strategy that includes respect for workers' labour rights, rather than address modern slavery as a standalone issue. Workers whose labour rights are respected are less likely to be susceptible to exploitative practices, which can escalate to situations of slavery. Similarly, the preparation of a modern slavery statement should not be approached as an annual compliance exercise. Rather, it should be approached as a work in progress that brings together diverse groups from across the business throughout the year. The finished product should reflect the ongoing efforts of the company.

Companies rely heavily on certifications and social audits to identify modern slavery risks. Within the FTSE 100, only a handful of companies recognise that such schemes are not as effective as a more a holistic human rights due diligence process. Human rights due diligence is a process that includes ongoing engagement, negotiation and collaboration. Engagement with workers, trade unions and NGOs is a key component and provides companies with invaluable insight into human rights risks, including modern slavery. As the CORE Coalition guidance, Tackling Modern Slavery through Human Rights Due Diligence, points out, *"Where companies undertake human rights due diligence, human rights impacts are more likely to be detected (including those linked to the activities of third parties), findings are more likely to be reported, human rights experts are more likely to be engaged and the effectiveness of actions taken in response to identified issues is more likely to be monitored".*

Corporate boards of directors and executive management must be involved in the development of a modern slavery strategy, and must provide support in the way of financial resources and dedicated personnel to implement it. A report by Ethical Trading Initiative and Hult International Business School found that twice as many CEOs and other senior executives are actively involved in addressing modern slavery since the Act came into force.

10. Transparency in Supply Chains, etc., A Practical Guide, Home Office https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc__A_practical_guide__final_.pdf

This correlates with anecdotal evidence that people working on these issues are meeting with less resistance from the board and executives. However, our analysis shows only 33% of the statements on the Modern Slavery Registry explicitly say the statement has been approved by the board or equivalent body. Some companies even delegate approval to an individual in the company, such as a director. Engagement and prioritisation by the board is vital to a successful strategy to combat modern slavery.

Many statements on the Modern Slavery Registry are from UK-based subsidiaries of non-UK parent companies; the non-UK parent does not produce its own statement. While the parent company may not be required to do so under Section 54 of the Act, doing so would be good practice and demonstrate a strong commitment to preventing modern slavery throughout the company at every level. Likewise, parent companies would show leadership by asking their subsidiaries to produce a statement even if they are not legally required to do so. This would support the due diligence efforts of the parent company and, by broadening the scope of companies looking into supply chains, may help identify more risks and potentially more victims.

WHAT'S ON THE HORIZON

Companies should be aware of additional reporting obligations that could potentially affect them. Under the EU Non-Financial Reporting Directive 2014 companies will be required to provide disclosure on human rights including the company's policy and its outcomes, due diligence processes, principal risks, and (where relevant and proportionate) its business relationships, products or services that are likely to cause adverse impacts, along with information about how those risks are managed. This will certainly encompass modern slavery. The UK transposition of the Directive came into force on 26 December 2016, and applies to company reports for financial years commencing on or after 1 January 2017.

The Australian government has announced its intention to adopt a modern slavery act in 2018, and said it is closely monitoring the effectiveness of laws such as the UK Act to ensure that an Australian reporting requirement reflects international best-practice. Given the weak disclosure in reporting in the UK this first year, it is not surprising the Australian government plans to require companies to report on certain reporting areas rather than have them be optional. There is also mandatory due diligence legislation such as the French Duty of Vigilance law, the Dutch Child Labour Law and the U.S. Trade Facilitation and Trade Enforcement Act that could affect large UK companies.

Companies in the UK should also be aware of the legal implications that corruption and bribery laws may have in the context of modern slavery. Experts point out that there is a strong link between modern slavery and corruption[12], and the regimes in place under the UK Bribery Act or the U.S. Foreign Corrupt Practices Act (FCPA) could be used to investigate supply chains to identify modern slavery and human trafficking. These laws are far-reaching, and could implicate many FTSE 100 and other large companies with operations outside the UK. Like the Modern Slavery Act, the UK Bribery Act applies to companies that carry on business or part of a business in any part of the UK regardless of where they are headquartered. The FCPA applies to any company with securities listed on a U.S. exchange which would cover most of the largest companies in the world and their subsidiaries.

12. Verité and Freedom Fund, An Exploratory Study on the Role of Corruption in International Labor Migration, http://freedomfund.org/wp-content/uploads/Verite-Report-Intl-Labour-Recruitment-FINAL-FOR-EMAIL.pdf

RECOMMENDATIONS

The first full year of reporting under the Act has come to an end. With the exception of a small number of leaders in the FTSE 100, the majority of companies provide vague commitments to eradicating modern slavery, without supporting those declarations with demonstrable action. At the time of the last briefing, we acknowledged the Act was relatively new and companies were on a learning curve. However, the FTSE 100 companies have had sufficient time to examine their strategies, processes and policies, and prepare a detailed statement. Instead, a tick-box approach still dominates in most statements.

- **FTSE 100 companies** should use their considerable resources to take systemic action to eliminate modern slavery from their operations and supply chains. Companies should seek to improve from the status quo and demonstrate rigorous efforts to eliminate slavery, and provide the leadership expected of the largest companies.

- **All companies** required to report under the Act should consult new guidance by CORE Coalition, paying particular attention to emerging better practice of leading companies such as that outlined in this report and learn from their peers' statements using the Modern Slavery Registry. They should raise awareness among suppliers of modern slavery risks and encourage them to conduct their own due diligence into their own operations and supply chains.

- **Corporate executives** should prioritise modern slavery as part of the strategic agenda of the company and support departments implementing policies and strategies, such as human rights, CSR, procurement, and ethical sourcing departments.

- **Advisors, lawyers and consultants** should promote a transparent, systemic and collaborative approach to eradication of slavery, and advise against a tick-box approach to reporting.

- **Investors** should engage with companies on their actions to tackle modern slavery and reward companies that demonstrate due diligence to avoid slavery and provide remedy. More information is available in CORE Coalition's briefing, Engaging with Companies on Modern Slavery – A Briefing for Investors.

- **UK Government** should publish a list of the companies required to produce statements under the Act; support open free accessible information regarding company compliance; and take measures to enforce the obligations of the Act and promote their reporting guidelines. The Government should improve monitoring and enforcement mechanisms to ensure companies that are required to report under the Act feel pressure to comply and are penalised they fail to do so.

- **Civil society** should continue to support a 'race to the top' by benchmarking companies, and providing a reputation reward for companies with better practice and encourage low-performers to improve.

FTSE 100 CHART (as of 19 August 2017)

COMPANY NAME	HQ	INDUSTRY	ANNUAL STATEMENT DUE DATE	STATEMENT	MIN. REQUIREMENT
3i Group plc*	UK	Capital Markets	30 September	Link	Yes
Admiral Group plc	UK	Insurance	30 June	Link	No
Anglo American plc	UK	Metals & Mining	30 June	Link	Yes
Antofagasta plc	UK	Metals & Mining	30 June	Link	Yes
Ashtead Plant Hire Co Ltd (Ashtead Group plc)	UK	Trading Companies & Distributers	30 October	Link	No
Assosiated British Foods plc	UK	Food Products	12 March	Link	No
AstaZenaca	UK	Pharmaceuticals	30 June	Link	No
Aviva plc	UK	Insurance	30 June	Link	No
Babcock International Group plc*	UK	Commercial Services & Supplies	30 September	Link	Yes
BAE Systems plc	UK	Aerospace & Defense	30 June	Link	No
Barclays plc	UK	Banks	30 June	Link	Yes
Barratt Developments plc	UK	Household Durables	30 December	Link	No
BHP Biliton plc	Australia	Metals & Mining	30 December	Link	Yes
BP plc	UK	Oil, Gas & Consuable Fuels	30 June	Link	No
British American Tobacco plc	UK	Tobacco	30 June	Link	Yes
British Land Company plc*	UK	Equity Real Estate Investment Trusts	30 September	Link	No
BT plc*	UK	Diversified Telecommunication Services	30 September	Link	Yes
Bunzl plc	UK	Trading Companies & Distributers	30 June	Link	No
Burberry Group plc*	UK	Textiles, Apparel & Luxury Goods	30 September	Link	Yes
Carnival Corporation	UK	Hotels, Restaurants & Leisure	30 May	Link	No
Centrica plc	UK	Healthcare Equipment & Supplies	30 June	Link	No
Coca-Cola HBC AG	Switzerland	Beverages	30 May	Link	Yes
Compass Group plc*	UK	Hotels, Restaurants & Leisure	30 June	Link	No
ConvaTec Group plc	UK	Healthcare Equipment & Supplies	30 June	Link	Yes
CRH plc	Ireland	Construction Materials	30 June	Link	Yes
Croda International plc	UK	Chemicals	30 June	Link	No
DCC plc*	Ireland	Industial Conglomerates	30 September	Link	Yes
Diageo plc	UK	Beverages	30 December	Link	Yes
Direct Line Insurance Group plc	UK	Insurance	30 June	Link	No
easyJet plc	UK	Airlines	30 March	Link	Yes
Experian plc*	Ireland	Professional Services	30 September	Link	Yes
Ferguson plc (formerly Wolseley)	Switzerland	Trading Companies & Distributers	31 January	Link	No
Fresnillo plc	Mexico	Metals & Mining	30 June	Link	No
G4S plc	UK	Commercial Sevices and Supplies	30 June	Link	Yes
GKN plc	UK	Auto Components	30 June	Link	Yes
GlaxoSmithKline plc	UK	Pharmaceuticals	30 June	Link	Yes
Glencore plc	Switzerland	Metals & Minings	30 June	Link	Yes
Hammerson plc	UK	Real estate Management & Development	30 June	Link	Yes
Hargreaves Lansown plc	UK	Capital Markets	30 December	Link	Yes
HSBC Holdings plc	UK	Banks	30 June	Link	No
Imperial Brands plc	UK	Tobacco	30 March	Link	Yes
Informa plc		Media	30 June	Link	No
InterContinental Hotels Group plc	UK	Hotels, Restaurants & Leisure	30 June	Link	Yes
International Consolodated Airlines Group SA	UK	Airlines	30 June	Link	Yes
Intertek Group plc	UK	Professional Services	30 June	Link	No
ITV plc	UK	Media	30 June	Link	Yes
Johnson Matthey plc*	UK	Chemicals	30 September	Link	Yes
Kingfisher plc	UK	Speciality Retail	30 June	Link	Yes
Land Securities Group plc*	UK	Real Estate Management & Development	30 September	Link	Yes
Legal & General Group plc	UK	Insurance	30 June	Link	No
Lloyds Banking Group plc	UK	Banks	30 June	Link	Yes
London Stock Exchange plc	UK	Capital Markets	30 June	Link	No
Marks & Spencer plc*	UK	Mulitiline Retail	2 October	Link	Yes
Mediclinic International plc		Healthcare Providers & Services	30 September	Link	No
Merlin Entertainments plc	UK	Hotels, Restaurants & Leisure	30 June	Link	No
Micro Focus International plc		Software	30 October	Link	Yes
Mondi Group plc	S. Africa	Containers & Packaging	30 June	Link	Yes
Morrison (WM) Supermarkets plc	UK	Food & Staples Retailing	30 July	Link	Yes
National Grid plc*	UK	Multi-Utilities	30 September	Link	Yes
NEXT plc	UK	Multiline Retail	30 July	Link	Yes
Old Mutual plc		Insurance	30 June	Link	No
Paddy Power Betfair plc		Hotels, Restaurants & Leisure	30 June	Link	No
Pearson plc	UK	Media	30 June	Link	Yes
Persimmon plc	UK	Household Durables	30 June	Link	No
Provident Financial plc	UK	Consumer Finance	30 June	Link	Yes
Prudental plc	UK	Insurance	30 June	Link	No
Randgold Resources Limited	UK	Metals & Mining	30 June	Overdue statement	
Reckitt Benckiser Group plc	UK	Household Products	30 June	Link	No
RELX Group plc	UK	Media	30 June	Link	No
Rentokil Initial plc		Commercial Services & Supplies	30 June	Link	Yes
Rio Tinto plc	UK	Metals & Mining	30 June	Link	Yes
Rolls Royce Holdings plc	UK	Aerospace & Defense	30 June	Link	No
Royal Bank of Scotland plc	UK	Banks	30 June	Link	No
Royal Dutch Shell plc	Netherlands	Oil, Gas & Consumable Fuels	30 June	Link	No
Royal Mail plc	UK	Air Freight & Logistics	27 September	Link	Yes
RSA Insurance Group plc	UK	Insurance	30 June	Link	No
Sage Group plc*	UK	Software	30 March	Link	Yes
Sainsbury (J) plc	UK	Food & Staples Retailing	13 September	Link	Yes
Schroders plc	UK	Capital Markets	30 June	Link	No
Scottish Mortgage Investment Trust plc		Capital Markets	30 March	No statement	
Segro plc	UK	Equity Real Estate Investment Trusts	30 June	Link	Yes
Severn Trent plc*	UK	Water Utilities	30 September	Link	No
Shire plc	Ireland	Biotechnology	30 June	Link	Yes
Sky plc*	UK	Media	30 December	Link	Yes
Smith & Nephew plc	UK	Healthcare Equipment & Supplies	30 June	Link	Yes
Smiths Group plc*	UK	Industrial Conglomerates	31 January	Link	No
Smurfit Kappa Group plc		Containers & Packaging	30 June	Link	No
SSE plc*	UK	Electric Utilities	30 September	Link	Yes
St. James's Place plc	UK	Capital Markets	30 June	Link	Yes
Standard Chartered plc	UK	Banks	30 June	Link	Yes
Standard Life Aberdeen plc	UK	Diversified Financial Services	30 June	Link	Yes
Taylor Wimpey plc	UK	Household Durables	30 June	Link	Yes
Tesco plc	UK	Food & Staples Retailing	27 August	Link	Yes
TUI AG	Germany	Hotels, Restaurants & Leisure	30 March	Link	Yes
Unilever plc	UK	Personal Products	30 June	Link	Yes
United Utilities plc*	UK	Utilities	30 September	Link	Yes
Vodafone Group plc*	UK	Wireless Telecommunications Services	30 September	Link	No
Whitbread Group plc	UK	Hotels, Restaurants & Leisure	30 September	Link	No
Worldpay Group plc	UK	IT Service	30 June	Link	Yes
WPP plc	UK	Media	30 June	Link	No

*Companies that had first-year statements featured in our analysis published in October 2016. Some have second-year statements due by 30 September 2017

About Business & Human Rights Resource Centre

Business and Human Rights Resource Centre is an international NGO that tracks the human rights impacts (positive & negative) of over 7000 companies in over 180 countries making information available on its eight language website. We seek responses from companies when concerns are raised by civil society. The response rate is over 75% globally.

Business & Human Rights Resource Centre

About Modern Slavery Registry

The Modern Slavery Registry is operated by Business & Human Rights Resource Centre. The Registry is a free and independent resource and holds over 3000 statements. Investors use it to assess company risks, and consumers and activists can use it to reward leading companies and press laggards to take action. Companies also use it to learn from their peers. If your company has produced a statement to comply with this legislation that you would like to appear in the Registry, please send it to Patricia Carrier (carrier@business-humanrights.org) or use the Submit a Statement function on the Registry website www.modernslaveryregistry.org.

Modern Slavery Registry