Modern Slavery Benchmark

Assessment criteria 2026



CCLA

GOOD INVESTMENT

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Executive summary

The CCLA Modern Slavery Benchmark framework has changed for 2026:

- In this new framework, companies will be assessed against 56 questions, broken down into 78 scoring criteria. In total, there are 750 points available.
- There are 10 new questions and we have removed three questions.
- We have modified 27 questions, through either adding new scoring criteria or changing existing criteria.
- The benchmark has been restructured. We have removed the section 'Conformance with UK Home Office guidance on modern slavery' and added 'Contextual modern slavery disclosure'. Data points relating to the transparency in supply chains framework are now distributed among relevant questions in the 'Find it', 'Fix it' and 'Prevent it' sections.

Introduction

Modern slavery is a serious abuse of human rights encompassing several forms of exploitation, including forced labour, human trafficking, servitude and forced marriage. Eradicating modern slavery has been set as a target in the UN Sustainable Development Goals, and its achievement will require dedication, innovation and collaboration.

There is huge potential for companies' actions to reduce modern slavery globally. Given the scale of forced labour and its prevalence in the private economy, CCLA believes that all large, listed companies are exposed to the risk of modern slavery through their global operations and supply chain.[1] Companies can therefore implement policies to actively find, fix and prevent modern slavery and set corporate and industry standards with their good practice. We recognise, of course, that some companies are more exposed to the risk of modern slavery than others; however, whatever their level of exposure, companies can take additional steps to strengthen their approach.

CCLA has been publishing its Modern Slavery Benchmark for three years. During this time, we have seen improvements in corporate disclosure and gradual increases in the average company scores and tier rankings. In turn, this upward trajectory has encouraged us to review the framework to ensure it is aligned with current thinking on corporate human rights reporting and continues to stretch companies wishing to continue on their improvement journey.

In March 2025, the UK Home Office updated its 'Transparency in supply chains' (TISC) statutory guidance, significantly raising the standards for corporate human rights reporting and due diligence.[2] As part of this process, CCLA sat on a Forced Labour Forum with other representatives from government, civil society, business and academia. The publication of the new guidance was a further impetus for our framework review.

Benchmark design

The CCLA Modern Slavery Benchmark is designed to objectively assess how listed companies approach and manage modern slavery, based on their published information, and to encourage improved practice.

Its main aims are to:

1. develop a framework on the degree to which companies are active in the fight against modern slavery
2. create an objective assessment of corporate modern slavery performance aligned with statutory requirements, government guidance, and international voluntary standards on business and human rights
3. support investors' engagement with companies on their approach to modern slavery
4. provide a vehicle for learning and sharing good practice
5. create a mechanism to leverage business competition to drive improvement in practice.

The CCLA Modern Slavery Benchmark was launched in 2023 and its first iteration was conducted on 97 of the largest UK-listed companies.[3] This provided a good baseline assessment, with an average percentage score of 55%.

The second UK benchmark was conducted in 2024.[4] It assessed the largest UK-listed companies plus 10 companies that had been assessed in 2023. The results demonstrated clear improvement: 65 companies improved their overall score and 35 companies moved up at least one performance tier.

The CCLA Modern Slavery UK Benchmark 2025 demonstrated further improvement.[5] The average percentage score was 60%, and half of the companies were ranked in the top two performance tiers.

In May 2025, between the publication of the second and third UK benchmarks, we also published a global benchmark pilot.[6] This aimed to ascertain whether the methodology developed for the UK benchmark in 2023, partially based on the UK Modern Slavery Act 2015[7] and the corresponding UK Home Office guidance,[8] could be applied to global companies. The pilot provided a useful landscape review of global corporate efforts on modern slavery and led us to develop a full-scale project.

In January 2026, we published the first Modern Slavery Global Benchmark report.[9] We assessed the largest non-UK-listed global companies, plus any others that had been assessed in the pilot. The average percentage score was 45% and almost half of the assessed companies ranked in the bottom two performance tiers.

In 2026, we have revised and updated the CCLA Modern Slavery Benchmark framework. This was prompted by the gradual increase in UK companies' scores and the publication in March 2025 of the Home Office's updated TISC statutory guidance, to which CCLA contributed as a member of the Forced Labour Forum.[10] This guidance explains how businesses should comply with the letter and spirit of the UK Modern Slavery Act 2015. We welcome it as it has significantly raised the standards for corporate human rights reporting and due diligence.

Benchmark development

The benchmark framework was reviewed through a multi-step process that spanned nine months.

We believe the framework is now more stretching than it was before. However, it is also more flexible, giving businesses with different modern slavery risk profiles more opportunities to score points.

Governance

We started with a gap analysis, comparing the original benchmark framework with the new criteria in the TISC guidance. We also sought input from the Home Office. Through this process, we identified significant overlaps between our original framework and the TISC guidance.

Additionally, we convened a multi-stakeholder advisory body to discuss how to approach updating the framework and to provide feedback on initial drafts. This group met twice, in July and September 2025, and included representatives from:

- Design for Freedom
- InterContinental Hotels Group
- Home Office Modern Slavery Unit
- Slave-Free Alliance
- Supply Chain Sustainability School
- Unilever
- Unseen.

We consulted the UK benchmarked companies in August 2025. When we invited them to provide feedback on their 2025 scorecards, we asked them to log comments on the proposed review of the framework. Sixteen companies provided feedback, much of which we incorporated into the new CCLA Modern Slavery Benchmark framework for 2026.

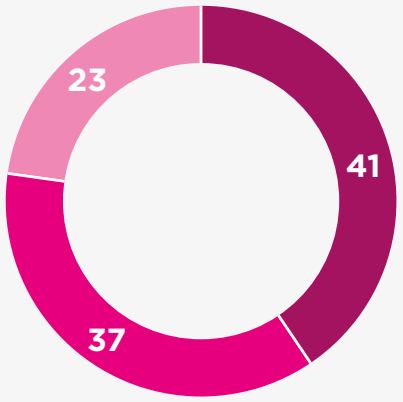
Once a draft had been developed, we tested it by scoring 15 companies to ensure we understood the likely impact of the new framework on companies' scores.

Changes to the assessment criteria

We have amended the structure of the benchmark by making changes to the scoring system and the sections.

We have also added, removed or amended scoring criteria for some questions. The chart below shows how the 2026 framework compares to the original version. The wording of some of the 'unchanged' questions has been tweaked for clarity, but this chart only shows amendments that impact how companies are scored.

COMPARISON OF ORIGINAL AND NEW FRAMEWORKS



Scoring system

The original benchmark framework assessed companies against 48 questions, broken down into 62 scoring criteria. Each criterion was effectively weighted at one point, although some questions had multiple criteria and, in total, could be worth 2 or 3 points. Overall, there were 62 points available.

Instead of using 1-, 2- and 3-point questions, the new framework uses 10-, 20- and 30-point questions. Most questions are still worth the minimum number of points (now 10).

The addition of new scoring criteria means that one question is now worth 40 points and one question has been broken down into two 5-point criteria. Two questions have 7 points available for meeting the first criterion and 3 additional points available for meeting a second, particularly stretching, criterion (for a total of 10).

See page 8 for more details on the new framework.

Sections

We have also restructured the sections of the benchmark. The original framework had five sections:

- 'UK Modern Slavery Act compliance and registry'
- 'Conformance with UK Home Office guidance on modern slavery' (referring to the 2021 guidance)
- 'Find it'
- 'Fix it'
- 'Prevent it'.

'Conformance with UK Home Office guidance on modern slavery' covered basic requirements to disclose contextual information about a company's direct operations and supply chain; identify, assess and manage modern slavery risks; train staff; and set modern slavery targets. More extensive human rights due diligence, remediation and preventative measures were covered in the 'Find it', 'Fix it' and 'Prevent it' sections.

Given the expansion of the Home Office's guidance, which now has significant overlap with our 'Find it', 'Fix it' and 'Prevent it' sections, we have realigned the sections to avoid duplication. The section names remain the same except for the second, which is now 'Contextual modern slavery disclosure'. This section incorporates the contextual business and supply chain metrics from the previous version. Additionally, questions on basic risk identification, management, training and targets have been reallocated to the 'Find it' and 'Prevent it' sections, which are both more heavily weighted in the new framework.

See page 8 for the full section breakdown and page 12 for the assessment criteria breakdown. All amendments and new questions are indicated.

Incorporating the 'transparency in supply chains' guidance

The Home Office's TISC guidance on the content that companies should include in their modern slavery statement is broken down into six sections: organisational structure, organisational policies, assessing and managing risk, modern slavery due diligence, training, and monitoring and evaluation. Within each of these, recommended disclosures are listed as bullet points and categorised into Level 1 and Level 2 disclosures. There is also additional text within each section, with 'key actions to consider'. We believe that many of these 'key actions' were already incorporated into our original framework.

The TISC guidance clarifies that Level 1 disclosures are the base requirements, whereas Level 2 disclosures are 'encouraged' once organisations have become more comfortable with the new reporting requirements.

As a rule, we have incorporated Level 1 disclosures into our new framework, except where our existing framework already partially aligned with a Level 2 requirement. In some (rare) cases, we did not include a Level 1 requirement that we considered to be too focused on process. An example of this is 'describe how the organisation gathered information to respond to the legislative requirements'.[11]

We have incorporated the Level 1 disclosures in two ways: by adding new questions and by amending the criteria of existing questions. Specifically, we have added seven new questions* and amended nine questions† to align with the TISC guidance.

The new questions cover areas where the TISC guidance was stronger than the original CCLA framework. These areas were continuous improvement, monitoring evaluation and learning, and consultation with people with lived experience of modern slavery. Just like the Home Office, we stress that engagement with people with lived experience needs to be conducted in a trauma-informed way.[12]

Incorporating stakeholder feedback

We have also added and amended questions and the corresponding scoring criteria based on feedback from our framework review advisory group, company engagement since 2023 and lessons learned from assessing companies. Based on this feedback, particularly feedback on how to better incorporate the TISC guidance, we have introduced three new questions** and amended a further 18 questions.‡

These additions and amendments are focused on emphasising responsible procurement practices and integrating downstream value chain activities into the framework alongside upstream supply chain activities. This is because, for many companies, their primary modern slavery risk is in their downstream value chain. This is reflected in the TISC guidance, which encourages companies to focus on 'risks beyond supply chains'.[13]

A consistent critique of our original framework was that it was sector agnostic. Businesses with known risks of modern slavery in their supply chains, particularly consumer goods companies, could score top points more easily. These companies are able to disclose cases more readily and could therefore usually score in the 'Fix it' section, which required finding a case of modern slavery to score most of the points. In comparison, other, lower-risk businesses would struggle to score these points, despite undertaking extensive due diligence, as finding cases of modern slavery in their industry is less common. We have addressed this concern by introducing two questions

* All cited question numbers relate to the new framework, beginning on page 12. The new questions are numbers 11, 14, 23, 41, 42, 53 and 56.

† These amendments included adding new scoring criteria, changing existing criteria and changing the whole question. The amended questions are numbers 7, 10, 12, 22, 40, 44, 48, 52 and 55.

** Questions 9, 39 and 43.

‡ These amendments included adding new scoring criteria, changing existing criteria and changing the whole question. The amended questions are numbers 8, 13, 15–21, 24, 27, 31, 32, 36, 38, 45, 49 and 51.

on the disclosure and remedy of labour abuse, which is more widespread than modern slavery and therefore easier for companies to identify and act upon.*

We have also tweaked the scoring criteria for some questions to ensure that they retain the spirit of good practice that we are seeking in this benchmark. We are looking for companies to move beyond policy and evidence their practice.

Removed questions

We have removed three questions that were in the old framework as they were duplicative or poorly understood:

- Question 11: Did the company provide information about its due diligence processes in relation to modern slavery in its **business**?
- Question 12: Did the company provide information about its due diligence processes in relation to modern slavery in its **supply/service chains**?
- Question 38: Where violations were found, in the words of the UN Guiding Principles on Business and Human Rights, had the company disclosed whether it had caused, contributed to or been linked to an adverse human rights impact (modern slavery case)?

Additionally, we removed one of the scoring criteria from a question that remains in the updated framework:

- Question 46: What evidence was there of responsible procurement practices to encourage or reward good labour practices?

  Criterion for the third point available for this question: There is a specific mechanism for suppliers to anonymously give feedback to the company about purchasing practices and/or there is evidence that companies are surveying their suppliers' purchasing practices down the supply/service chain.

Overview of the new framework

The questions in the CCLA Modern Slavery Benchmark's framework are derived from international standards, widely used and recognised frameworks, and best practice guidelines.

The benchmark assesses companies against 56 questions, broken down into 78 assessment criteria that allow companies to score a maximum of 750 points. It is grounded in the UK Modern Slavery Act 2015, the corresponding TISC guidance, and the UN Guiding Principles on Business and Human Rights. It also draws on existing best practice developed by organisations including the Business and Human Rights Centre, the Ethical Trading Initiative and KnowTheChain (see page 53 for further details of these sources).

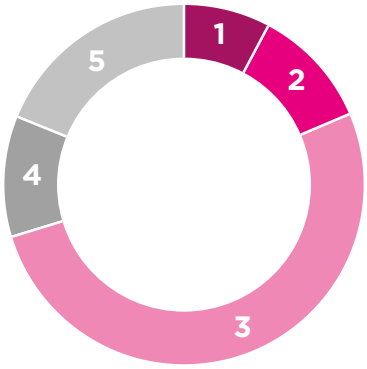
As outlined earlier in this report, the criteria are distributed between five sections:

- UK Modern Slavery Act compliance and registry
- Contextual modern slavery disclosure
- Find it
- Fix it
- Prevent it.

The sections are weighted as illustrated in the top half of the next page. This weighting reflects our belief that 'finding' modern slavery is the hardest task but matters the most.

Companies continue to be ranked across five performance tiers. This enables us to evaluate the maturity of their approach to modern slavery. The tiers are now defined as set out in the bottom half of the next page.

* Questions 39 and 43.



1 UK Modern Slavery Act compliance and registry 8%

Derived from the UK Modern Slavery Act 2015. This section also takes account of whether the company's statement has been uploaded to the UK government's Modern Slavery Statement Registry.

2 Contextual modern slavery disclosure 11%

Assesses the quality of the company's reporting on its structure, business, supply chain and downstream value chain in its human-rights-related disclosures. This is critical information enabling external stakeholders to contextualise the company's modern slavery approach.

3 Find it 52%

Covers the company's business and human rights due diligence processes and its efforts to find, assess and measure the risks of modern slavery in its business, supply chain and downstream value chain. This section also examines whether the company has disclosed modern slavery and/or labour abuse.

4 Fix it 11%

Covers the company's efforts to provide remediation to victims of modern slavery and clarifies how it is working to fix systemic modern slavery risks.

5 Prevent it 19%

Covers the company's efforts to prevent the occurrence of modern slavery in its direct operations, supply chain and downstream value chain. This section examines areas including governance, target-setting, recruitment and procurement practices.

Note: due to rounding, the percentages do not sum to 100%.

PERFORMANCE TIERS

Performance tier	Percentage score	Tier description
1 **Leading**	81–100	The company has a leading approach to human rights practice and disclosure. There is breadth and depth in its discussion of modern slavery risks across its direct operations, supply chain and downstream value chain. It meaningfully engages with rights holders and those with lived experience, demonstrates purposeful and effective activities to find, fix and prevent modern slavery, and provides remedy where appropriate. It considers how it can improve its approach year on year, and the impact of its own corporate activities on human rights.
2 **Mature**	61–80	The company has a mature approach to human rights informed by experts or civil society partners. Its approach is structured and embedded across the business with clear evidence of implementation. There may be evidence of providing remedy to affected groups. There may also be gaps in depth and disclosure across the company's full value chain. Opportunities remain to expand rights holders' engagement, assess the impact of its corporate activities, and integrate continuous improvement.
3 **Evolving**	41–60	The company has an active approach to modern slavery risk assessment and management. Its approach is risk-based and has good governance and policies in place. The company has clear opportunities to strengthen its due diligence processes to ensure they are fully capturing the risks to rights holders across its value chain.
4 **Developing**	21–40	The company is developing its approach to business and human rights. It has relevant policies and is developing due diligence processes but risk assessments are generally desk-based. Risks are not captured across the company's direct operations, downstream value chain and/or supply chain. There is little evidence of continuous improvement, provision of remedy to affected groups, and engagement with rights holders.
5 **Unsatisfactory**	0–20	The company has a limited modern slavery approach. It may not have an in-date modern slavery statement.

2026 benchmarking process

In 2026, we will again assess two sets of companies: ones listed in the UK and ones listed globally. Both sets will be assessed on their publicly available information as at 15 July 2026.

CCLA works with the environmental, social and governance data consultancy Canbury to train a large language model (LLM) to support the assessment of company disclosures. The disclosures will be gathered manually and fed through the LLM, which will create a scorecard for each company. An extensive human-led quality assurance process will then be employed, wherein human assessors will check each data point to ensure accuracy and confidence in the outputs.

This hybrid process was trialled in 2025. It enabled the scalable and consistent analysis of large volumes of text (what LLMs are designed to do) while ensuring that the ingrained expert knowledge within CCLA remained core to the process.

After completing preliminary assessments, we will share our findings with each company individually. The companies will then have a three-week period to suggest amendments and to point us to any information in the public domain that we may have missed. The CCLA team will evaluate each comment and, following final quality checks, finalise the assessments.

The benchmark rankings will be published in one report in December 2026.

How companies are chosen

The companies in the UK and Global benchmarks will be selected in January 2026 based on their market capitalisation, inclusion in previous benchmarks and whether they are in the scope of the UK Modern Slavery Act 2015.

All companies listed in the UK are in the scope of the Modern Slavery Act.

If a company is not listed in the UK, we determine whether it is in the scope of the Modern Slavery Act using the following criteria from the law. Companies are required to comply if they meet all of the following criteria:

- they 'supply goods or services'
- they 'have an annual turnover of £36 million or more'
- they 'carry on a business, or part of a business, in the UK'.[14]

We have interpreted these criteria to mean that companies do not need to supply goods or services or meet the turnover threshold in the UK specifically.

For the third criterion, the Home Office recommends taking a 'common-sense approach' in determining whether companies carry on business in the UK. It also provides a list to help companies self-assess whether they have a demonstrable presence in the UK. The criteria are:

- being registered at UK Companies House
- having UK offices
- providing service or support functions in the UK
- receiving income in the UK
- having another visible UK business presence – for example, a website.[15]

If a company fulfils more than one of these points, we deem it to carry on a business in the UK. We source the relevant data from annual accounts on the Companies House website or from annual reports (or equivalent).

Where companies do not produce a group-level modern slavery statement, we assess each subsidiary or brand individually to determine whether it should comply with the Modern Slavery Act.

Accepted sources of evidence for the benchmark assessments

The assessments involve a review of the material available on companies' corporate websites on the assessment date. The primary document used in the assessments is a company's UK modern slavery statement, alongside sustainability reports, annual reports and other relevant publications. Disclosures via additional platforms, such as the reporting function of the UK Modern Slavery Statement Registry, are only assessed for question 2.

Given that the first section of the framework is based on the UK Modern Slavery Act 2015, the only disclosure scored in that section is a company's UK modern slavery statement. Where a group statement does not exist, we assess each subsidiary in the scope of the Modern Slavery Act. In these cases, for the parent company to be awarded points, each underlying subsidiary has to comply. Statements pursuant to modern slavery legislation outside the UK are not assessed.

The second section is 'Contextual modern slavery disclosure'. For this section, all group-level human-rights-related disclosures are scored. These include but are not limited to human rights reports, EU Corporate Sustainability Reporting Directive reports, and statements pursuant to Australian, Californian, Canadian, French, German, Norwegian, Swiss or UK human rights transparency legislation. The contextual information assessed in this section should be in human-rights-related disclosures to enable investors and other interested stakeholders to contextualise the company's human rights performance.

The 'Find it', 'Fix it' and 'Prevent it' sections of the benchmark assess all group-level disclosures. The focus of the assessment is on the corporate entity, mirroring investors' interest in how companies are tackling modern slavery across their group operations. However, where one subsidiary makes up more than 40% of a group's total business revenue, its disclosures are considered to be in scope for the 'Find it', 'Fix it' and 'Prevent it' sections. In these cases, the subsidiary disclosures are scored alongside the group's.

To ensure that we compare companies on a level playing field, only publications that cover the same time period as the UK modern slavery statement are scored. This is particularly relevant for annual reports, sustainability reports and integrated reports. We recognise that companies often publish their human rights report and/or sustainability report biannually. Where this is the case, we assess the most recent report, provided it has been published during the past two reporting cycles. Other disclosures, such as human rights policies and supplier codes of conduct, are considered evergreen.

Assessment criteria

This section sets out the 56 assessment questions in the CCLA Modern Slavery Benchmark 2026.

In reviewing the framework, we have implemented changes to how questions are scored (see page 6). Where these changes affect how the scoring criteria are applied to companies, we have indicated as such. New questions are also flagged. Changes to the wording of questions for clarity have not been flagged.

Some questions are broken down into multiple criteria. Often, the criteria are not linked: each one is individually worth the indicated number of points, so companies need to score each criterion to be awarded maximum points for the question. However, there are several questions where one criterion is worth maximum points. Where the scoring is laddered in this way, this has been indicated.

Definitions

The framework uses the following terms to evaluate each company's business model and inform how the scoring criteria are applied.

Business	All of the commercial activities of a company.
Contract labour	Part of the supply chain. Individuals who are not on the company's payroll and who are hired to complete a specific project or service.
Direct operations	Directly employed personnel and processes overseen by head office. This includes temporary labour.
Downstream value chain	Key business partnerships, franchisee relationships, customers, investments and portfolios.
Key business partnerships	Part of the downstream value chain. Refers to alliances with other companies and joint ventures.
Structure	The legal and organisational components of a company and how they relate to one another.
Supply chain	Part of the upstream value chain. The network of organisations and individuals involved in delivering a product or service to the company. This encompasses suppliers of goods, service providers and contract labour.
Temporary labour	Part of a company's direct operations. Individuals directly employed by the company, or staffing agency, who are hired to cover a short-term gap in the workforce.
Value chain	All activities that a company is involved in. It includes a company's customers, direct operations, franchise relationships, investments, portfolios, key business partnerships and supply chain.

The framework also uses the following subject-specific terms.

Audit	An on-site inspection of a supplier's or site's human rights and labour practices.
Audit protocol	The specific techniques that auditors use in a social audit to detect forced labour where it may be hidden.
Employer Pays Principle	The idea that no worker should pay for a job and therefore that the cost of recruitment should be borne by the employer, not the worker.
Labour abuse	The abuse of people in the workplace for profit. Some examples of labour exploitation are excessive working hours, failure to pay the minimum wage and making workers carry out tasks in a dangerous environment.
Labour arbitrage	The process of enhancing efficiency by finding and using low-cost labour to produce goods and services. Typically, it involves relocating parts of the business or supply chain to another location, where labour can be acquired at a lower cost while maintaining, or even improving, quality.
Mapping the supply chain	An ongoing process undertaken to understand where products or services come from and where tier-one suppliers' sub-suppliers are located.
Modern slavery	A serious abuse of human rights encompassing several forms of exploitation, including forced labour, human trafficking, servitude and forced marriage. For the purposes of this assessment, CCLA defines modern slavery as the presence of forced labour, child labour, human trafficking or at least one of these International Labour Office indicators of forced labour: debt bondage, restriction of movement, retention of identity documents and withholding of wages.[16]
Purchasing practices	A company's activities in relation to its suppliers. These are deemed responsible when they do not put suppliers under undue pressure.
Responsible exit strategy	The process by which a company would exit a supplier relationship in such a way as to minimise consequences for the workers who may be affected by this decision.
Salient modern slavery risks	The most severe human rights risks people face by virtue of a company's actions. These can include forced labour, debt bondage and child labour.
Social audit	An evaluation of an organisation's social and ethical standards. For the purposes of this assessment, a social audit is an on-site visit to verify human rights standards.
Tier-one suppliers	The suppliers with a direct relationship to the business, excluding buying agents.
Tier-two (and beyond) suppliers	The direct suppliers to tier-one suppliers, their suppliers, and so on.

UK Modern Slavery Act compliance and registry



About this section

This section of the CCLA Modern Slavery Benchmark is mostly derived from the statutory requirements of the UK Modern Slavery Act 2015. Additionally, it addresses whether companies have uploaded their statement to the UK Modern Slavery Statement Registry.

For this section, only UK modern slavery statements are considered.

Question 1

Does the company include a prominent and clearly marked link to its modern slavery and human trafficking statement on its website homepage?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

The Modern Slavery Act requires companies to publish a modern slavery statement on their website and put it in a prominent place on their homepage. This increases transparency and ensures the statement is easily accessible to all stakeholders.

Scoring

0	There is no direct, clearly labelled link to a modern slavery statement on the company's homepage.
10	There is a direct, clearly labelled link to a modern slavery statement on the company's homepage.

Maximum achievable score: 10

Explanatory notes

- The link must be visible on the company's homepage (either group or UK site).
- It must be clearly labelled (e.g. 'Modern slavery statement' or 'Modern Slavery Act statement') so that the contents are evident.
- Links to corporate reporting webpages or general sustainability pages are not sufficient.

Question 2

Has the company uploaded its modern slavery statement to the Modern Slavery Statement Registry?

Corresponding standards

None

Rationale

This is not a statutory requirement of the Modern Slavery Act. However, uploading to the registry is considered part of the spirit of the 'transparency in supply chains' ethos that the Modern Slavery Act promotes.

Scoring

0	The modern slavery statement has not been uploaded to the Modern Slavery Statement Registry.
10	The modern slavery statement has been uploaded to the Modern Slavery Statement Registry.

Maximum achievable score: 10

Explanatory notes

- Companies will be assessed on one date in July each year, so statements will need to be on the registry on this date to score.

Question 3

Is the modern slavery statement signed by a director?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

This is a statutory requirement of the Modern Slavery Act. It ensures that modern slavery processes have appropriate support from senior management and creates a public accountability mechanism.

Scoring

0	There is either a typed signature or no signature from a director on the modern slavery statement.
10	There is a physical signature from a director on the modern slavery statement.

Maximum achievable score: 10

Explanatory notes

- The benchmark specifies a physical signature above a typed or electronically produced name to ensure that senior management have had oversight of the modern slavery statement.

Question 4

Is the modern slavery statement approved by the board of directors or an equivalent management body?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

This is a statutory requirement of the Modern Slavery Act. It ensures senior-level accountability and responsibility for modern slavery.

Scoring

0	The statement has not been approved by the board of directors or an equivalent management body.
10	The statement has been approved by the board of directors or an equivalent management body.

Maximum achievable score: 10

Question 5

Does the company provide an explanation of the steps that it has or has not taken to ensure slavery and human trafficking are not taking place in any part of its business or supply chain?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

This is a statutory requirement of the Modern Slavery Act.

Scoring

0	There is no discussion of the steps taken to combat modern slavery.
10	There is an explanation of the steps taken to address modern slavery.

Maximum achievable score: 10

Question 6

Does the statement cover the most recent fiscal year?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

The Modern Slavery Act requires companies to report on their progress annually.

Scoring

0	There is no modern slavery statement for the most recent fiscal year.
10	There is a modern slavery statement that covers the most recent fiscal year.

Maximum achievable score: 10

Explanatory notes

- Companies will be assessed on one date in July each year. Modern slavery statements will be considered to cover the most recent fiscal year if they have been published, at most, 15 months prior to that date.

Contextual modern slavery disclosure



Question 7

To what extent does the company provide information about its **business** and **structure** in its modern slavery and human rights disclosures?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

This question refers to companies' legal and organisational structure. This is critical information for defining the scope of due diligence, clarifying the governance structure and allowing companies to show how their structure impacts their risk profile. It is also crucial for assessing how companies set out their approach to modern slavery.

Scoring

0	The company provides no or limited information about its business and/or its structure.
10	The company provides partial information about both its business and its structure.
20	The company provides comprehensive information about both its business and its structure.

Maximum achievable score: 20

Explanatory notes

- Partial points are awarded to companies that:
  - explain what they do, their sector and their markets
  - give a brief explanation of their brands and name their main product offerings
  - give a partial list of their subsidiaries covered by their UK modern slavery statement.
- Maximum points are awarded to companies that:
  - explain the volumes of goods and services they produce
  - give an in-depth explanation of their governance structure in terms of departments and brands, and how those report into the main decision-making body
  - give a full list of subsidiaries (pursuant to the UK Modern Slavery Act 2015)
  - disclose which other human rights due diligence legislation they report to.

Changes to note

Business activities, organisational structure and disclosure of other relevant human rights due diligence legislation have been added to the scope of this question.

About this section

This section of the CCLA Modern Slavery Benchmark assesses the quality of companies' reporting on their structure, direct operations, supply chain and downstream value chain in their human-rights-related disclosures. This is critical information enabling external stakeholders to contextualise a company's modern slavery approach.

For this section, all group-level human-rights-related disclosures are scored. These include but are not limited to human rights reports, EU Corporate Sustainability Reporting Directive reports, and statements pursuant to Australian, Californian, Canadian, French, German, Norwegian, Swiss or UK human rights transparency legislation.

Previous modern slavery statements and other human-rights-related disclosures are not scored.

For definitions of terms used in this section, refer to page 12.

Question 8

To what extent does the company provide information about its **direct operations** and **downstream value chain** in its modern slavery and human rights disclosures?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should have good oversight of their direct operations and downstream value chain, so they can begin to identify where modern slavery risks lie. This information is also crucial for assessing how companies set out their approach to modern slavery and where they focus their due diligence.

Scoring

0 The company provides no or limited information about its direct operations and/or its downstream value chain.

10 The company provides partial information about both its direct operations and its downstream value chain.

20 The company provides comprehensive information about both its direct operations and its downstream value chain.

Maximum achievable score: 20

Explanatory notes

- To score either partial or maximum points for this question, companies must provide information on **both** their direct operations and their downstream value chain.
- In order to score, companies must refer to relevant downstream value chain activities. These may include, but are not limited to, key business partnerships, franchisee relationships, customers, investments and portfolios.
- Partial points are awarded to companies that:
  - disclose the scope of their direct operations
  - disclose where they have exposure to downstream value chain activities
  - give a geographical breakdown of their direct operations and downstream value chain activities.
- Maximum points are awarded to companies that:
  - disclose the scope of their direct operations and relevant downstream value chain activities
  - describe their downstream value chain activities, including the activities' operating model and aims, and the nature of the company's involvement
  - give a country-level breakdown of their direct operations and downstream value chain activities, including highlighting any higher-risk geographies
  - disclose job types and working environments for both directly employed staff and those working within downstream value chain activities.

Changes to note

Downstream value chain activities have been explicitly included in the scope of this question. We have also moved the requirement to disclose both the scope and the locations of direct operations from the maximum points criterion to the partial point criterion.

NEW

Question 9

Does the company explain in its modern slavery and human rights disclosures how it categorises its suppliers by type?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Demonstrating a good understanding of the supply chain is critical. Companies should show how they categorise and prioritise suppliers based on type, tier and/or spend. This supplier typology should be the first step in a risk prioritisation process. Categorisation also helps external stakeholders to understand likely risks for certain supplier types and allows for comparability across sectors.

Scoring

0	The company does not explain how it categorises its suppliers.
10	The company explains how it categorises its suppliers by type, tier and/or spend.

Maximum achievable score: 10

Explanatory notes

- This question looks for companies to distinguish between different types of suppliers: goods, services and contract labour. It also looks for them to show how they group suppliers based on factors such as spend and tier.

Question 10

To what extent does the company provide information about its supply chain in its modern slavery and human rights disclosures?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Supply chains are often complex and interconnected. Companies should have good oversight of their supply chain so that they can successfully identify modern slavery risks. Publicly disclosing this information helps external stakeholders to assess the risks of modern slavery in a company's supply chain.

Scoring

0	The company provides no or limited information about its supply chain.
10	The company provides partial information about its supply chain.
20	The company provides comprehensive information about its supply chain.

Maximum achievable score: 20

Explanatory notes

- Companies must disclose this information about all types of supplier in their supply chain: goods, services and contract labour (as relevant).
- Partial points are awarded to companies that:
  - give brief details of the products, commodities and/or services they source from their suppliers
  - give a geographical breakdown of their suppliers.

Question 10 continued

- Maximum points are awarded to companies that:
  - name the main products, commodities and/or services they source from their suppliers
  - give a country-level breakdown of their suppliers
  - disclose the approximate number of suppliers they work with
  - disclose how they source and assemble goods (if relevant)
  - disclose the types of environment that supply chain workers operate in and the types of job they complete
  - disclose which suppliers they have the most leverage over.

Changes to note

The criterion for maximum points now requires disclosure of how goods are sourced and assembled (if relevant), the types of environment supply chain workers operate in, and which suppliers the company has most leverage over.

NEW

Question 11

Does the company explain how its knowledge of its supply chain or downstream value chain has improved since the publication of its previous modern slavery and human rights disclosures?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should demonstrate how their modern slavery approach continues to evolve by highlighting improvements in each modern slavery statement. This allows external stakeholders to assess their progress.

Scoring

0	The company does not explain how it has improved its visibility of its supply chain or downstream value chain since its previous modern slavery and human rights disclosures.
10	The company explains how it has improved its visibility of its supply chain or downstream value chain since its previous modern slavery and human rights disclosures.

Maximum achievable score: 10

Explanatory notes

- As this question is linked to the TISC guidance's focus on continuous improvement, companies must explicitly state how their activities have improved their knowledge and understanding of their supply chain or downstream value chain.
- This question focuses on companies' improvements in location mapping and knowledge of their value chain workforce. Improvements in risk assessments and other due diligence processes are scored in question 41.

Find it



Question 12

To what extent does the company provide information about its policies in relation to modern slavery?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Corporate attempts to tackle modern slavery should be supported by a strong internal governance process. Policies are the first step in a company's risk management process. Organisational policies should be set out clearly, accessible to all employees and widely communicated. They should be built into contracts across self-assessment, audit, training and capacity-building activities for suppliers, subcontractors, customers and other business partners. This helps to embed anti-slavery activity within an organisation's value chain as standard practice.

Scoring

0	The company does not have modern-slavery-related policies that are aligned with international standards.
5	The company has modern-slavery-related policies that are aligned with international standards.
10	The company makes clear how its modern-slavery-related policies (which are aligned with international standards) are communicated to relevant stakeholders throughout its value chain.

Maximum achievable score: 10

Explanatory notes

- To be considered to be related to modern slavery, a policy must either express zero tolerance for modern slavery or set out ethical guidelines for how to interact with suppliers. Possible types of policy include, but are not limited to, human rights policies, supplier codes and responsible procurement policies.
- All modern-slavery-related policies must be aligned with international standards – for example, the ILO Core Conventions, the OECD Guidelines for Multinational Enterprises or the UNGPs.
- For maximum points, companies must:
  - ensure all their policies are publicly available
  - explain how their policies are integrated into contracts (or equivalent) with suppliers, subcontractors and other business partners
  - explain how workers throughout the value chain are made aware of the policies.

Changes to note

The criterion for maximum points has been added to encourage companies to disclose how they disseminate policies to stakeholders throughout the value chain. The criterion for partial points has been altered to indicate that companies must disclose how their policies are aligned with international standards.

About this section

This section of the CCLA Modern Slavery Benchmark covers a company's human rights due diligence processes and the degree to which they are designed to find modern slavery. To be active in the fight against modern slavery, companies need to be able to identify their areas of highest risk and increase the visibility of their employment practices in these areas. We recognise that risk identification and management systems will vary in sophistication based on the materiality and salience of the risk.

For this section, all information that companies have disclosed in the public domain is eligible for consideration.

For definitions of terms used in this section, refer to page 12.

Question 13

Does the company have a stand-alone human rights policy which clearly states that it supports the UN Guiding Principles on Business and Human Rights and recognises its duty to respect human rights and provide access to remedy?

Corresponding standards

Home Office 'TISC' guidance (2025); UNGPRF

Rationale

The UN Guiding Principles on Business and Human Rights (UNGPs) are a 'set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations'.[17] They have become the preeminent global standard for corporate human rights. Companies should support the UNGPs as doing so commits them to supporting and enabling remedy for human rights abuses.

Scoring

0	The company does not have a stand-alone human rights policy explicitly aligned with the UNGPs.
10	The company has a stand-alone human rights policy explicitly aligned with the UNGPs.

Maximum achievable score: 10

Changes to note

Companies must have a **stand-alone** human rights policy aligned with the UNGPs. Previously, commitments to the UNGPs in other disclosures were scored.

NEW

Question 14

Does the company demonstrate engagement with external stakeholders to develop and implement its modern-slavery-related policies?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should work with external stakeholders to magnify their impact and pursue systemic change. In terms of policy, external stakeholders can point to best practice and critically assess a company's existing approach.

Scoring

0	The company does not show how it has consulted with external stakeholders to develop or implement its modern-slavery-related policies.
10	The company shows how it has consulted with external stakeholders to develop and implement its modern-slavery-related policies.

Maximum achievable score: 10

Explanatory notes

- Companies must name the credible external stakeholders they have engaged with and explain how they have worked together to develop and implement modern slavery policies.

Question 15

Does the company have a supplier code of conduct containing an expectation that the company's modern slavery standards will be cascaded down its value chain?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should cascade their standards throughout their value chain to ensure consistency in ethical practices. A policy expectation that modern slavery standards are cascaded throughout the value chain is the first step in tackling modern slavery in lower tiers of the supply chain and other indirect relationships.

Scoring

0	The company does not have a supplier code of conduct that includes an explicit expectation that modern slavery standards will be cascaded down the value chain.
10	The company has a supplier code of conduct that includes an explicit expectation that modern slavery standards will be cascaded down the value chain.

Maximum achievable score: 10

Explanatory notes

- Companies must include this expectation in a supplier code of conduct, or equivalent, to score the points available for this question.

Changes to note

This question was previously included in a metric that scored companies if they either had a policy commitment to cascading modern slavery expectations down their supply chain or conducted monitoring themselves. The two requirements have been split into two questions (15 and 36) to track policy commitment and monitoring as separate indicators of company performance.

Question 16

Does the company **identify** and disclose the parts of its **direct operations** and **downstream value chain** where there is a risk of modern slavery?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should consider and disclose the risk of modern slavery across their direct operations and relevant parts of their downstream value chain. This information is crucial for prioritising additional due diligence and risk management efforts.

Scoring

0 The company does not identify the modern slavery risks in both its direct operations and relevant downstream value chain activities.

10 The company identifies and discloses the parts of its direct operations and relevant downstream value chain activities where there is a risk of modern slavery.

Maximum achievable score: 10

Explanatory notes

- As well as referring to their direct operations, companies must refer to relevant downstream value chain activities to score. These may include, but are not limited to, key business partnerships, franchisee relationships, customers, investments and portfolios.

Changes to note

Downstream value chain activities have been explicitly included in the scope of this question.

Question 17

Does the company disclose its due diligence process by describing the steps it has taken to **assess** the risk of modern slavery in its **direct operations** and **downstream value chain**?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should prioritise the most resource-intensive due diligence mechanisms for the parts of their business where the modern slavery risks are the highest. To do this, they should conduct a comprehensive risk assessment covering relevant parts of their direct operations and downstream value chain. Disclosing the process gives investors and other stakeholders a clear view of the rigour and scope of the company's assessment.

Scoring

0 The company does not describe the steps it has taken to risk assess its direct operations and relevant downstream value chain activities, how this process results in an active risk management approach, and/or how often risk assessments are conducted.

10 The company describes how risk assessments are conducted, how this results in an active risk management approach for both its direct operations and relevant downstream value chain activities, and how often risk assessments are conducted.

Maximum achievable score: 10

Question 17 continued

Explanatory notes

- Companies must disclose a systematic process for risk identification and evaluation, with evidence that findings lead to specific actions.
- Companies must also disclose how often they conduct or update their supplier risk assessments.
- As well as referring to their direct operations, companies must refer to relevant downstream value chain activities to score. These may include, but are not limited to, key business partnerships, franchisee relationships, customers, investments and portfolios.

Changes to note

Downstream value chain activities have been explicitly included in the scope of this question. Companies must now also state how often they update their modern slavery risk assessment.

Question 18

Does the company disclose its due diligence process by describing the steps it has taken to **manage** the risk of modern slavery in its **direct operations** and **downstream value chain**?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Managing and mitigating the risk of modern slavery within direct operations and the downstream value chain is an important step in the due diligence process. Risk management processes are crucial for protecting workers and for limiting the reputational risk incurred by modern slavery cases. Companies should consider how to manage the risk across their direct operations and relevant parts of their downstream value chain. They should then disclose their management approach to give investors and other stakeholders a clear view of its strengths.

Scoring

0	The company does not disclose the steps it has taken to actively manage the risk of modern slavery in both its direct operations and relevant downstream value chain activities.
10	The company discloses the steps it has taken to actively manage the risk of modern slavery in its direct operations and relevant downstream value chain activities.

Maximum achievable score: 10

Question 18 continued

Explanatory notes

- Companies should manage their modern slavery risk actively, guided by the risk profile of their operations and downstream value chain activities.
- In their operations, companies should, as a minimum, have a grievance mechanism open to all employees and training for all staff on modern slavery. In their higher-risk direct operations, they should, as a minimum, train on-site duty officers and ensure that whistleblowing mechanisms are clearly communicated to employees.
- As well as referring to their direct operations, companies must refer to relevant downstream value chain activities to score. These may include, but are not limited to, key business partnerships, franchisee relationships, customers, investments and portfolios.
- In their downstream value chain, companies should be actively engaging on modern slavery, training relevant staff and monitoring on-site activity (as relevant).

Changes to note

Downstream value chain activities have been explicitly included in the scope of this question.

We have raised the expectations around how companies manage risk in their direct operations, particularly where they directly operate higher-risk sites.

Question 19

Does the company **identify** and disclose the parts of its **supply chain** where there is a risk of modern slavery?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Disclosing the parts of a supply chain with a higher modern slavery risk demonstrates that a risk assessment has taken place. This information is crucial for prioritising additional due diligence and risk management efforts, given that the supply chain is often the highest-risk part of a company's operations.

Scoring

0	The company does not identify the parts of its supply chain where there is a risk of modern slavery.
10	The company identifies the high-risk geographies, products, commodities and labour types across its goods suppliers, materials suppliers and contract labour (as relevant).

Maximum achievable score: 10

Explanatory notes

- Companies must point to **where** the risks are in their supply chain, across all relevant types of supplier (goods, services and contract labour).

Changes to note

Companies must now discuss risks across all parts of their supply chain – goods, services and contract labour – as relevant.

Question 20

Does the company disclose its due diligence process by describing the steps it has taken to **assess** the risk of modern slavery in its **supply chain**?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should prioritise the most resource-intensive due diligence mechanisms for the parts of their supply chain where the modern slavery risks are the highest. To do this, they should conduct a comprehensive risk assessment covering their whole supply chain – goods, services and contract labour (as relevant). Disclosing the process gives investors and other stakeholders a clear view of the rigour and scope of the company's assessment.

Scoring

0 The company does not describe the steps it has taken to risk assess its goods suppliers, service suppliers and contract labour (as relevant), how this process results in an active risk management approach, and/or how often risk assessments are conducted.

10 The company describes how risk assessments are conducted; how this results in an active risk management approach for its goods suppliers, service suppliers and contract labour (as relevant); and how often risk assessments are conducted.

Maximum achievable score: 10

Explanatory notes

- Companies must disclose a systematic process for risk identification and evaluation, with evidence that findings lead to specific actions.
- Companies must also disclose how often they conduct or update their supplier risk assessments.

Changes to note

Companies must discuss risks across all parts of their supply chain – goods, services and contract labour – as relevant. Companies must now also state how often they update their modern slavery risk assessment.

Question 21

Does the company disclose its due diligence process by describing the steps it has taken to **manage** the risk of modern slavery in its **supply chain**?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Managing and mitigating the risk of modern slavery within supply chains is critical. Risk management processes are crucial for protecting workers and for limiting the reputational risk incurred by modern slavery cases. Companies should consider how to manage the risk across their supply chain. They should then disclose their management approach to give investors and other stakeholders a clear view of its strengths.

Scoring

0	The company does not disclose the steps it has taken to actively manage the risk of modern slavery for its goods suppliers, service suppliers and contract labour (as relevant).
10	The company discloses how risk assessments are conducted and how this process results in an active risk management approach for its goods suppliers, service suppliers and contract labour (as relevant).

Maximum achievable score: 10

Explanatory notes

- Companies must disclose how they manage modern slavery risks across all types of supplier: goods, services and contract labour (as relevant).
- We recognise that risk management systems will vary in sophistication based on the materiality and salience of the risk.
- In higher-risk supply chains, companies should ensure that there is, at a minimum, a supply chain code of conduct, on-site monitoring, training on supplier management and a grievance mechanism that workers can access.

Changes to note

Companies must discuss risks across all parts of their supply chain – goods, services and contract labour – as relevant.

We have raised the expectations around how companies manage risk in their supply chain, particularly where suppliers are at a higher risk of modern slavery.

Question 22

To what extent does the company disclose information about modern slavery training provided to staff?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Training is a key part of embedding a modern slavery governance structure and helping staff to identify modern slavery cases and risks. It also helps to support broader business policies and practices by making modern slavery a clear priority on a company's agenda.

Scoring

0	The company discloses no or minimal information about staff training on modern slavery.
10	The company discloses detailed information about staff training on modern slavery.
20	The company discloses additional information about specialist training for staff in higher-priority roles.

Maximum achievable score: 20

Explanatory notes

- To score these points, companies must train their employees on modern slavery specifically. Even if the company's code of conduct or ethics includes a modern slavery section, training staff on its use is not sufficient unless the modern slavery section meets all the criteria on its own.
- Partial points are awarded to companies that:
  - describe the content of their standard modern slavery training
  - disclose the materials used to deliver their modern slavery training
  - disclose who is required to complete their standard modern slavery training.
- Maximum points are awarded to companies that also:
  - provide specialist modern slavery training for individuals in higher-priority roles
  - disclose the content of their specialist modern slavery training
  - explain how this training is enhanced in comparison to the standard modern slavery training they deliver.
- 'Higher-priority role' may be defined in terms of either area of work or seniority. For example, some teams will be deemed higher priority because they are especially concerned with assessing and managing modern slavery risks – examples of these teams include procurement, facilities management, legal, risk (especially in financial companies), HR and recruitment. Alternatively, senior leaders (such as members of the executive leadership team, board members or senior managers) may be trained. This can ensure that the modern slavery approach is integrated throughout the company and enables senior staff to spot systemic modern slavery risks.

Changes to note

The criterion for partial points now includes disclosure of the content of the modern slavery training, the materials used to deliver it and which individuals must complete it. Previously, this question simply assessed whether modern slavery training was conducted at all.

An additional criterion for maximum points – conducting specialist modern slavery training – has also been added.

NEW

Question 23

Does the company explain what it does not know in relation to its supply chain or downstream value chain?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should continually be evaluating their modern slavery approaches to inform where they should prioritise resources in the future. Disclosing the limits of their knowledge demonstrates transparency and builds stakeholders' confidence that they know where they need to improve.

Scoring

0	The company does not explicitly disclose what it does not know in relation to its supply chain or its downstream value chain.
10	The company explicitly discloses what it does not know in relation to its supply chain or its downstream value chain.

Maximum achievable score: 10

Explanatory notes

- This question aims to evaluate how effectively companies are reflecting on their modern slavery risk assessment and management.
- Companies must ensure that their disclosures are explicitly related to their own business activities – hypotheticals and generalisations will likely not score the points available for this question.

Question 24

Does the company explain how it is mapping the extent of its supply chain?

Corresponding standards

BHRC 4.3; Home Office 'TISC' guidance (2025)

Rationale

Mapping the supply chain is an ongoing process undertaken to understand where products and services come from and where tier-one suppliers' sub-suppliers are located. This process is crucial in combatting modern slavery because visualising the supply chain allows for high-risk areas and groups to be identified.

Scoring

0	The company does not explain how it is mapping its supply chain and/or does not name the tools it is using to facilitate the process.
10	The company both explains how it is mapping its supply chain and names the tools it is using to facilitate the process.

Maximum achievable score: 10

Explanatory notes

- Companies must demonstrate how they are actively working to determine the locations of their sub-tier-one suppliers and/or service providers.

Changes to note

The emphasis has shifted from requiring companies to state that they will conduct ongoing mapping to requiring companies to demonstrate how this work is taking place, including naming the tools or technology used in the process.

Question 25

Does the company disclose the locations of its tier-one suppliers?

Corresponding standards

BHRC 1.5; Home Office 'TISC' guidance (2025); KTC 2.1

Rationale

Understanding where tier-one suppliers are located is a crucial first step in a modern slavery risk assessment. Disclosing this information publicly also allows for civil society organisations and rights defenders to efficiently escalate concerns about supplier working conditions to company management, if necessary.

Scoring

0 The company does not disclose a list of tier-one supplier locations that covers a significant portion of its supplier base, or locations are given as continents or regions.

10 The company discloses a partial list of tier-one supplier locations, to at least country level, covering a significant portion of its supplier base.

20 The company discloses a list of tier-one supplier locations with addresses, covering all suppliers or a high-risk sector.

Maximum achievable score: 20

Question 26

Does the company disclose the locations of its suppliers beyond tier one?

Corresponding standards

BHRC 1.5; Home Office 'TISC' guidance (2025); KTC 2.1

Rationale

Mapping suppliers beyond tier one is necessary for comprehensive supply chain transparency. Further down the supply chain, workers are more vulnerable to modern slavery. Understanding where sub-suppliers are located allows companies to point to the riskiest parts of their business.

Scoring

0 The company does not disclose the locations of its tier-two or lower suppliers, or locations are given as continents or regions.

10 The company discloses the locations of its tier-two or lower suppliers.

Maximum achievable score: 10

Question 27

To what extent does the company provide details of how it analyses its overall supply chain by risk (e.g. in relation to sourcing, geography, commodity and spend)?

Corresponding standards

BHRC 1.5; Home Office 'TISC' guidance (2025); KTC 2.1

Rationale

Given the complexity of global supply chains, having a sophisticated risk assessment process is key in assessing where due diligence should be prioritised. Disclosing how risk factors are integrated into a risk assessment is one way to show a robust process. It is best practice to conduct ongoing monitoring using site-level data, and this is awarded the highest number of points.

Scoring

0	The company does not disclose the factors that influence its modern slavery risk assessment process; provide case studies on geographies, commodities, sectors or worker types; or demonstrate how risk assessment data gathered on-site influences its modern slavery risk assessment process.
10	The company discloses the factors that influence its modern slavery risk assessment process.
10	The company discloses in detail how specific geographies, commodities, sectors or worker types influence its modern slavery risk assessment process.
10	The company discloses how risk assessment data gathered on-site influences its modern slavery risk assessment process.

Maximum achievable score: 30

Explanatory notes

- To score maximum points, companies must meet all three scoring criteria.
- For the final criterion, we are looking for companies to show how data gathered on-site is fed back into their risk assessment process at the system level. Conducting audits and issuing corrective action plans does not necessarily demonstrate the systemic integration of data that we are looking for, as lessons learned will likely remain at site level.

Changes to note

The scoring has been changed to a non-laddered approach. To score maximum points, companies should now name the factors affecting their risk assessments, provide detailed case studies on how these factors impact their risk assessment process, and show how on-site data is fed into their risk assessments.

This is because, previously, companies would often meet the criterion for conducting on-site assessments without giving a full picture of their risk profile through case studies. Both are valuable parts of a risk assessment.

Question 28

To what extent does the company provide information on the workforce in both its direct operations and its supply chain?

Corresponding standards

KTC 2.1

Rationale

Knowing the number of workers in a company's direct operations and supply chain is another part of mapping the supply chain. It allows companies to visualise their workforce, identify risks and know who those risks are linked to.

Scoring

0	The company does not disclose any information, or the only information disclosed is the number of direct employees.
10	The company discloses partial information on the workforce in its operations and supply chain, demonstrating that it understands the size of its workforce.
20	The company additionally discloses a detailed breakdown of its supply chain workforce.

Maximum achievable score: 20

Explanatory notes

- Partial points are awarded to companies that:
  - disclose the number of their direct employees and the number of workers in their tier-one supply chain
  - make it clear that they understand the size of their operational and supply chain workforce.
- Maximum points are awarded to companies that provide a more detailed breakdown of their supply chain workforce by location or vulnerable characteristics.

Question 29

Does the company recognise the human rights risks associated with the recruitment of migrants and contract labour?

Corresponding standards

Home Office 'TISC' guidance (2025); KTC 2.1

Rationale

Indirect methods of recruitment and a lack of permanent contracts can make workers more vulnerable to labour exploitation. Debt bondage and recruitment fees particularly affect migrants, alongside other subcontracted staff. Recognising the risks migrants and other contract workers face is a crucial first step for companies to take.

Scoring

0	The company does not identify the risks surrounding the recruitment of migrants and other contract labourers.
10	The company identifies migrant and contract workers as strongly at risk of modern slavery.

Maximum achievable score: 10

Question 30

Does the company disclose how migrants and/or contract labour are recruited?

Corresponding standards

Home Office 'TISC' guidance (2025); KTC 2.1

Rationale

Given the higher risk that migrants face, companies should disclose the methods they use to monitor migrant and/or contract labour. They should also disclose the recruitment practices, above and beyond standard recruitment procedures, they use to avoid exploitation.

Scoring

0	The company does not disclose the enhanced practices and monitoring it uses for the recruitment of migrant and/or contract labour.
10	The company discloses the enhanced practices and monitoring it uses for the recruitment of migrant and/or contract labour.

Maximum achievable score: 10

Explanatory notes

- Companies must show how they mitigate the higher risks that migrants face (e.g. debt bondage or confiscation of identity documents), including how they have integrated an understanding of these risks into their hiring practices.

Question 31

To what extent does the company provide details of how its modern slavery risk assessment for relevant parts of its operations, supply chain and downstream value chain is carried out?

Corresponding standards

BHRC 3.6, 4.2, 4.5, 4.6, 4.7; Home Office 'TISC' guidance (2025); KTC 1.5, 2.2; S2G 19, 20; UNGPRF B2

Rationale

Examining the tools used in a risk assessment is one way to judge the sophistication of the process. Direct worker engagement is the most effective way to identify modern slavery risks and cases. In many instances this is challenging, which is why we consider industry or multi-stakeholder initiatives related to modern slavery, which tend to have contact with localities, as an interim stage between desk-based analysis and local dialogue. These risk assessment tools should be used across the company's operations, supply chain and downstream value chain.

Scoring

0	The company gives no information about the tools it uses to conduct its modern slavery risk assessment across its operations, supply chain and downstream value chain.
10	The company's modern slavery risk assessment for relevant parts of its operations, supply chain and/or downstream value chain is founded on desk-based analysis.

Question 31 continued

10 The company's modern slavery risk assessment for relevant parts of its operations, supply chain and/or downstream value chain engages with multi-stakeholder or industry initiatives related to modern slavery.

30 The company's modern slavery risk assessment for relevant parts of its operations, supply chain and/or downstream value chain incorporates continuous dialogue with rights holders or their local representatives.

Maximum achievable score: 30

Changes to note

Downstream value chain activities have been explicitly included in the scope of this question.

The scoring has also been altered to partially use a non-laddered approach. Companies can still score maximum points for incorporating worker dialogue into their modern slavery risk assessments. However, those that do not undertake worker dialogue can alternatively score 10 points each for demonstrating membership of multi-stakeholder initiatives and for showing that they have undertaken desk-based analysis of their operations, supply chain and/or downstream value chain.

Additionally, the criterion for maximum points has been altered. To score, companies must now demonstrate **continuous** dialogue with local stakeholders, rather than one-off projects.

Question 32

To what extent does the company disclose and explain its most salient modern slavery risks in relevant parts of its operations, supply chain and downstream value chain?

Corresponding standards

BHRC 4.1, 4.4, 4.8, 4.9;
Home Office 'TISC' guidance (2025);
KTC 2.2; S2G 17; UNGPRF B1

Rationale

Salient human rights issues are the 'human rights at risk of the most severe negative impact through the company's activities and business relationships'.[18] Consideration of salient risks is a characteristic of a risk assessment that centres the impact of modern slavery on the workers rather than the business.

Scoring

0 The company does not name salient modern slavery risks and/or describe how these risks could manifest in its business.

10 The company names salient modern slavery risks, describes their likelihood and indicates how they can occur in its business.

20 The company names salient modern slavery risks, describes their likelihood, and discusses how its business model and/or procurement practices may exacerbate its salient modern slavery risks.

Maximum achievable score: 20

Explanatory notes

- Companies must disclose risks to workers or rights holders, rather than high-risk business areas.

Question 32 continued

Changes to note

Downstream value chain activities have been explicitly included in the scope of this question.

An additional criterion for maximum points has been added requiring companies to discuss how their business practices may exacerbate their most salient modern slavery risks.

Question 33

Does the company disclose how it prioritises suppliers for audit purposes?

Corresponding standards

Home Office 'TISC' guidance (2025); KTC 6.1

Rationale

Companies should prioritise the most resource-intensive due diligence mechanisms for the parts of their supply chain where the modern slavery risks are the highest. Disclosing the process for audit prioritisation demonstrates a systematic approach to due diligence.

Scoring

0	The company does not conduct on-site audits and/or does not provide information on the audit prioritisation process.
10	The company conducts on-site audits and discusses how suppliers are prioritised for audits.

Maximum achievable score: 10

Explanatory notes

- In this question, 'audits' refers to on-site inspection of human rights practices.
- Companies will likely prioritise audits based on risk assessment rating, or by sector, geography or commodity.

Question 34

Does the company include a discussion of which supply chain auditors or partners it has appointed, including how it has assured their competency in finding and detecting modern slavery?

Corresponding standards

BHRC 3.4; Home Office 'TISC' guidance (2025); KTC 6.2.4 (modified)

Rationale

Due diligence procedures will vary by risk profile but are a crucial part of a company's approach to modern slavery. Social auditing, or the use of third-party monitors, is one of the most common approaches to understanding risk in a supply chain. However, it is not without its critics, who point to significant flaws and opportunities for audit fraud.[19] Companies should ensure that auditors or partners are suitably qualified to identify modern slavery where it exists.

Scoring

0 The company gives no information about how it has assured the competency of its auditors or partners.

10 The company conducts on-site audits and demonstrates how it has assured the competency of its auditors.

Maximum achievable score: 10

Explanatory notes

- There are many ways to demonstrate how the competency of auditors or partners has been assured, including:
  - disclosing auditor accreditations
  - using auditors specialising in human rights
  - disclosing any specialist techniques the auditors use
  - internally reviewing third-party audits to verify their effectiveness.

Question 35

To what extent does the company include a discussion of its audit protocols?

Corresponding standards

Home Office 'TISC' guidance (2025); KTC 6.1

Rationale

A comprehensive audit process is crucial for combatting modern slavery. Protocols such as unannounced visits, off-site interviews and audits of secondary production facilities demonstrate an advanced process that is more likely to ensure audit integrity and elicit information that workers may be unwilling to share in front of management.

Scoring

0 The company provides no information on its audit protocols.

10 The company provides brief detail on its audit protocols.

20 The company provides a detailed discussion of multiple audit protocols it has used.

Maximum achievable score: 20

Question 36

Does the company include on-site monitoring beyond tier one in its audit procedure?

Corresponding standards

KTC 6.1

Rationale

Companies should conduct on-site monitoring beyond tier one, as the most vulnerable workers are often further down the supply chain.

Scoring

0	There is no evidence that the company conducts on-site monitoring of suppliers beyond tier one.
10	There is evidence that the company conducts on-site monitoring of suppliers beyond tier one.

Maximum achievable score: 10

Changes to note

This question was previously included in a question that scored companies if they either had a policy commitment to cascading modern slavery expectations down their supply chain or conducted monitoring themselves. The two requirements have been split into two questions (15 and 36) to track policy commitment and monitoring as separate indicators of company performance.

Question 37

Does the company ensure that all its workers (in its direct operations, supply chain and downstream value chain) have access to an independent grievance mechanism through which they can raise human-rights-related concerns?

Corresponding standards

BHRC 3.8; Home Office 'TISC' guidance (2025); KTC 5.3; S2G 35 (see also ETI)

Rationale

Enabling workers to report concerns is necessary for the identification of labour exploitation and the assessment of risk. These whistleblowing systems should be anonymous, in a language workers understand and available to all workers in the company's value chain.

Scoring

0	The company does not have a grievance mechanism, or the grievance mechanism is not clearly available to all workers in the value chain.
10	The company has a grievance mechanism available to workers in its direct operations, supply chain and downstream value chain.

Maximum achievable score: 10

Explanatory notes

- Companies must make clear that all workers – including workers in the supply chain and value chain – can access the grievance mechanism.

Question 38

Does the company disclose the number of whistleblowing reports on modern slavery and/or labour abuse it has received?

Corresponding standards

BHRC 3.8; Home Office 'TISC' guidance (2025); KTC 5.3; S2G 35; UNGPRF (see also ETI)

Rationale

An indicator of the effectiveness of grievance mechanisms is whether workers are using them to report concerns. Reporting the number of whistleblowing reports flagged relating to modern slavery and/or labour abuse also demonstrates that these reports are being actively managed.

Scoring

0	The company does not have a grievance mechanism open to all workers in the value chain and/or does not disclose the number of whistleblowing reports received in relation to modern slavery and/or labour abuse.
10	The company has a grievance mechanism open to all workers in the value chain and discloses the number of whistleblowing reports received in relation to modern slavery and/or labour abuse.

Maximum achievable score: 10

Explanatory notes

- Companies cannot score on question 38 without scoring on question 37, which requires them to have a grievance mechanism open to all workers in their value chain.
- Companies must report explicitly on whistleblowing reports related to modern slavery and/or labour abuse. They can do this by discussing whistleblowing reports in disclosures related to modern slavery and/or labour abuse, or by including a 'modern slavery and labour abuse' category within disclosures about general whistleblowing reports received for the year.

Changes to note

Question 38 cannot be scored without scoring question 37. This is to ensure that we are assessing the effectiveness of a whistleblowing mechanism open to workers in the whole value chain, not just direct employees.

Companies must now make explicit that their whistleblowing reports relate to modern slavery and/or labour abuse. General disclosures will not necessarily be awarded points.

NEW

Question 39

Does the company disclose finding cases of labour abuse in its value chain?

Corresponding standards

Home Office 'TISC' guidance (2025); UNGPRF

Rationale

Modern slavery is the most severe endpoint on a spectrum of labour exploitation, but companies may find many other forms of lesser labour exploitation. Companies should disclose these cases to demonstrate a proactive due diligence approach and promote transparency among investors and other stakeholders.

Scoring

0	The company does not disclose a case of labour abuse in its value chain that does not meet the CCLA definition of modern slavery.
10	The company discloses a case of labour abuse in its value chain that does not meet the CCLA definition of modern slavery.

Maximum achievable score: 10

Explanatory notes

- Labour abuse is the mistreatment of people in the workplace for profit. Examples include excessive working hours, failure to pay the minimum wage and making workers carry out tasks in a dangerous environment.
- Although modern slavery is the most extreme form of labour abuse, this question specifically relates to exploitation below the level of modern slavery. Therefore, cases that are credited in question 40 cannot be credited in question 39.
- While we recognise that some companies may struggle to find labour abuse, this question cannot be scored without disclosing a case. It is not sufficient to say that there were no instances.

Question 40

Does the company disclose finding modern slavery and/or a suspected case of modern slavery in its value chain?

Corresponding standards

Home Office 'TISC' guidance (2025); UNGPRF

Rationale

Not identifying cases of modern slavery does not necessarily demonstrate an effective approach. With 28 million people worldwide estimated to be trapped in forced labour, modern slavery is a prevalent human rights concern.[20] It can occur in any country and in a wide variety of circumstances. Finding modern slavery demonstrates effective risk assessment and due diligence processes, whereas not finding cases may indicate weaknesses in the approach. Additionally, publicly disclosing cases is best practice for transparency and accountability.

Scoring

0	The company does not disclose a confirmed or suspected case of modern slavery, or identify a widespread systemic modern slavery challenge, in its value chain.
7	The company discloses a confirmed or suspected case of modern slavery, or identifies a widespread systemic modern slavery challenge, in a particular sector or geography that it is linked to.
10	The company explicitly discloses the total numbers of confirmed and suspected cases of modern slavery found.

Maximum achievable score: 10

Explanatory notes

- Although we recognise that some companies struggle to find modern slavery, this question cannot be scored without disclosing a case. It is not sufficient to say that there were no instances of modern slavery.
- CCLA defines modern slavery as the presence of forced labour, child labour, human trafficking or at least one of these International Labour Office (ILO) indicators of forced labour: debt bondage, restriction of movement, retention of identity documents or withholding of wages.[21]
- For the purposes of this question, a suspected case of modern slavery is defined as the presence of two or more of these ILO indicators: abuse of vulnerability, deception, isolation, physical or sexual violence, intimidation or threats, abusive working or living conditions or excessive overtime. The indicators must be present in relation to one individual.
- Companies may disclose a case from previous years, providing remediation efforts are ongoing.

Changes to note

The maximum points criterion now requires companies to disclose how many confirmed and suspected cases they have found. This is to encourage full transparency.

NEW

Question 41

Does the company explain how its approach to due diligence has changed since its previous statement and outline plans to improve its risk assessment in the future?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should demonstrate how their modern slavery approach continues to evolve by highlighting improvements in their due diligence approach between each modern slavery statement and committing to further improvements.

Scoring

0 The company does not explain how any action taken in the previous year has improved its due diligence processes and/or does not disclose the actions it will take in the following year to improve its risk assessment processes.

10 The company explains how at least one action taken in the previous year has improved its due diligence processes and discloses at least one action it will take in the following year to improve its risk assessment processes.

Maximum achievable score: 10

Explanatory notes

- Companies must explicitly show how their actions have resulted in an improved approach.

Fix it

NEW

Question 42

Does the company provide a detailed summary of its existing remediation mechanisms, policies and processes?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should be able to set out the steps they would take to remedy the situation if they were to identify a case of modern slavery in their direct operations, supply chain or downstream value chain.

Scoring

0 The company does not provide a detailed summary of its remediation mechanisms, policies and processes.

10 The company discloses a detailed summary of its remediation mechanisms, policies and processes.

Maximum achievable score: 10

Explanatory notes

- This is the only question in this section that does not rely on question 39 or question 40 being scored.
- Companies must include a summary of their remediation mechanisms, policies and processes that, at a minimum, includes:
  - how the case would be escalated internally
  - the team responsible for providing remedy
  - the types of remedy that would be provided
  - how the effectiveness of the provided remedy would be verified.

NEW

Question 43

Where cases of labour abuse are identified, does the company disclose the steps it has taken to end and remedy ongoing risks?

Corresponding standards

Home Office 'TISC' guidance (2025); UNGPRF

Rationale

Remediation plays a pivotal role in addressing labour abuse by directly addressing those who have been impacted. Where violations are found, it is vital to revise procedures to protect workers in the future.

Scoring

0 The company does not disclose sufficient actions taken to end the cases of labour abuse and prevent their reoccurrence.

10 The company discloses sufficient actions taken to end the cases of labour abuse and prevent their reoccurrence.

Maximum achievable score: 10

Explanatory notes

- This question cannot be scored without scoring question 39.
- Although modern slavery is the most extreme form of labour abuse, remedy that is credited in question 44 cannot be credited in question 43.
- Companies must disclose the steps they have taken in relation to the case of labour abuse. At a minimum, the disclosure must cover:
  - actions taken to end the labour abuse situation
  - actions taken to prevent the labour abuse situation from reoccurring
  - the number or proportion of workers receiving remediation
  - how the company worked with other stakeholders to deliver remediation.

About this section

This section of the CCLA Modern Slavery Benchmark covers a company's efforts to provide remediation to victims of modern slavery and labour abuse, and how the company is working to fix systemic modern slavery risks.

For this section, all information that companies have disclosed in the public domain is eligible for consideration.

Companies must have disclosed a case of labour abuse (question 39) to be eligible to score question 43. Additionally, companies must have disclosed an actual or suspected case of modern slavery (question 40) to be eligible to score questions 44–47.

For definitions of terms used in this section, refer to page 12.

Question 44

Where cases of modern slavery are identified, does the company disclose the steps it has taken to end and remedy ongoing risks?

Corresponding standards

Home Office 'TISC' guidance (2025); UNGPRF

Rationale

Remediation plays a pivotal role in addressing modern slavery by directly addressing those who have been impacted. Where violations have been found, it is vital to revise procedures to protect workers in the future.

Scoring

0	The company does not disclose sufficient actions taken to end the cases of modern slavery and prevent their reoccurrence.
10	The company discloses partial information about its actions to end the cases of modern slavery and prevent their reoccurrence.
20	The company discloses comprehensive information about its actions to end the cases of modern slavery and prevent their reoccurrence.

Maximum achievable score: 20

Explanatory notes

- This question cannot be scored without scoring question 40.
- Partial points are awarded to companies that disclose:
  - at least one action taken to end the modern slavery situation
  - at least one action taken to prevent the modern slavery situation from reoccurring
  - how the company worked with other stakeholders to deliver remediation.
- Maximum points are awarded to companies that disclose:
  - multiple actions taken to end the modern slavery situation
  - multiple actions taken to prevent the modern slavery situation from reoccurring
  - at least two of the following: number or proportion of workers receiving remediation, how the company worked with other stakeholders to deliver remediation, the limitations of the remedy provided, a timeline of the case(s) and how the remedy was verified to be effective.

Changes to note

The criteria for partial points now include disclosure of the number or proportion of workers receiving remediation and how the company worked with other stakeholders to deliver remedy.

The criteria for maximum points now include disclosure of the limitations of the provided remedy.

Question 45

To what extent does the company report the outcomes of the remedy process for the victims?

Corresponding standards

Home Office 'TISC' guidance (2025); KTC 7.2; UNGPRF C2

Rationale

Companies should provide remediation that is centred on those who have experienced harm and tailored to their needs. Measures should go beyond the return of assets and focus on the long-term recovery and safety of those affected. It is best practice to work with independent, expert non-governmental organisations (NGOs) to facilitate safe and positive remedy.

Scoring

0	The company does not disclose any positive outcomes of the remedy process for survivors of modern slavery.
7	The company reports a positive outcome of the remedy process for survivors of modern slavery.
10	The company works with an expert NGO to provide comprehensive remedy for survivors of modern slavery.

Maximum achievable score: 10

Explanatory notes

- This question cannot be scored without scoring question 40.
- Maximum points are awarded to companies that:
  - work with an NGO qualified in victim support
  - disclose at least two of the following: how full economic compensation was provided (beyond the return of assets), how long-term psychological support was provided, and how the company facilitated access to legal or judicial support.

Changes to note

The maximum points criterion now requires companies to disclose how they provided comprehensive remedy for survivors of modern slavery.

Question 46

Does the company provide evidence that remedy was satisfactory to the victims or groups representing the victims?

Corresponding standards

Home Office 'TISC' guidance (2025); KTC 7.2; UNGPRF C6

Rationale

Evidence that remedy was satisfactory demonstrates an effective remediation process focused on the needs of those affected.

Scoring

0	There is no evidence given that remedy was satisfactory to survivors of modern slavery.
10	There is evidence that survivors of modern slavery were consulted on remedy and indicated that they were satisfied with the outcome.

Maximum achievable score: 10

Explanatory notes

- This question cannot be scored without scoring question 40.

Question 47

Where provision of remedy is not possible, does the company demonstrate how it has tried to use and increase its leverage with other responsible parties to enable remedy to take place?

Corresponding standards

Home Office 'TISC' guidance (2025); IRBC p8; S2G 29

Rationale

Provision of remedy is often challenging. Multiple companies may source from the supplier where modern slavery is occurring, or the issue may be widespread and pervasive across a sector. In this situation, companies should try to effect systemic change beyond remedy for the specific people who have experienced modern slavery in the cases disclosed.

Scoring

0	The company does not disclose how it has tried to increase its leverage and effect systemic change.
10	The company demonstrates how it is trying to increase its leverage and effect systemic change through industry collaboration and membership of initiatives working towards modern slavery remediation and prevention.
20	The company demonstrates how it is trying to increase its leverage and effect systemic change through leading its own industry or public policy initiative working towards modern slavery remediation and prevention.

Maximum achievable score: 20

Explanatory notes

- This question cannot be scored without scoring question 40.



Question 48

Does the company set goals, provide outcome-focused key performance indicators (KPIs) and report against these KPIs to ensure that it is making year-on-year progress in identifying, preventing and responding to modern slavery?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Monitoring is key to understanding how well a company's approach to modern slavery is working and where there are gaps. Organisations should clearly set out anti-slavery goals to improve their ability to identify, prevent, mitigate and respond more effectively to modern slavery risks year on year. Setting KPIs and reporting against them allows companies to track their progress and demonstrate their ongoing commitment to developing their approach.

Scoring

0	The company does not set goals or KPIs related to its modern slavery approach, and/or it does not report its performance outcomes against these KPIs.
10	The company sets at least one goal relating to an identified challenge or risk concerning its modern slavery approach.
10	The company discloses forward-looking quantifiable targets to track its progress towards each of its modern slavery goals.
10	The company reports its performance outcomes against its previous modern slavery KPIs.

Maximum achievable score: 30

Explanatory notes

- To score maximum points, companies must meet all three scoring criteria.
- Goals must be focused on outcomes and informed by specific risks in the company's operations and supply chain. They must be long-term aims that are broken down into measurable KPIs.
- KPIs must relate to the company's own actions, rather than setting targets to measure its suppliers' actions.
- 'Not finding modern slavery' is not a goal or KPI that will score points.

Changes to note

Modern slavery targets were covered in the previous benchmark by question 19: 'Did the company provide information about its effectiveness in eliminating modern slavery from its business or supply chains, measured against such performance indicators as it considered appropriate?' To score maximum points (1 point), companies needed to both disclose their modern slavery targets and report against them.

This question has been restructured. Companies are now awarded 10 points each for setting goals related to modern slavery, breaking these down into outcome-focused targets (KPIs) and reporting their progress against these targets. This is to encourage continuous improvement and a strategic approach to modern slavery.

About this section

This section of the CCLA Modern Slavery Benchmark covers companies' efforts to prevent the occurrence of modern slavery in their operations, supply chain and downstream value chain. It examines areas including governance, target-setting, recruitment practices and procurement practices.

For this section, all information that companies have disclosed in the public domain is eligible for consideration.

For definitions of terms used in this section, refer to page 12.

Question 49

Does the company describe its corrective action process for its suppliers and the procedures it follows in cases of continued non-compliance?

Corresponding standards

BHRC 5.6; Home Office 'TISC' guidance (2025); KTC 7.1

Rationale

Terminating a supplier relationship over modern slavery concerns often further jeopardises the workforce under the supplier and denies responsibility for remedy. A corrective action process is a good way to work constructively with suppliers to address the causes of labour issues.

Scoring

0	The company does not disclose any information on a corrective action process and/or the eventual outcome of continued non-compliance.
10	The company discloses a corrective action process that details the escalation procedures to be followed in the event of non-compliance and the eventual outcome of continued non-compliance.

Maximum achievable score: 10

Explanatory notes

- Companies must detail the escalation procedures they would implement. Examples include stop-work notices, warning letters, supplementary training and policy revisions.

Changes to note

Whereas companies were previously asked to disclose the eventual outcome of continued non-compliance, there is now an additional emphasis on companies disclosing the steps involved in their corrective action process.

Question 50

Does the company discuss its responsible exit strategy for supplier relationships?

Corresponding standards

Home Office 'TISC' guidance (2025); KTC 7.1

Rationale

Where a supplier will not engage constructively, exiting the relationship may be the only option. Where this is the case, companies should disclose the efforts they make to minimise the adverse effects of this decision on workers.

Scoring

0	The company does not disclose how it employs a responsible exit strategy.
10	The company discloses how it employs a responsible exit strategy.

Maximum achievable score: 10

Explanatory notes

- A responsible exit strategy comprises the steps a company would take to exit a supplier relationship in such a way as to minimise the consequences for workers who may be affected by this decision.
- The company must demonstrate an understanding that leaving a supplier relationship might put workers at further risk.

Question 51

Has the company integrated the Employer Pays Principle into its recruitment practices?

Corresponding standards

EPP; Home Office 'TISC' guidance (2025); KTC 4.2

Rationale

Companies should commit to and implement the Employer Pays Principle, which is a mechanism for responsible recruitment that protects migrant and contract labour. Companies should also show how they implement the principle in their recruitment practices.

Scoring

0	The company does not explicitly commit to the Employer Pays Principle and/or does not demonstrate how it implements the principle in its recruitment practices.
10	The company explicitly commits to the Employer Pays Principle (or issues a statement to this effect) and demonstrates how it implements the principle in its recruitment practices.

Maximum achievable score: 10

Explanatory notes

- The Employer Pays Principle states that a worker should not have to pay for employment and that the responsibility for recruitment fees falls to the employer.

Changes to note

The emphasis has shifted to how companies implement the Employer Pays Principle in their recruitment practices. Stating a commitment to the principle is no longer sufficient.

Question 52

To what extent does the company implement responsible procurement practices towards its suppliers and assess the impact of its procurement decisions on worker conditions?

Corresponding standards

ETI; Home Office 'TISC' guidance (2025)

Rationale

Responsible procurement practices are processes enacted to ensure that a company is not putting suppliers under undue pressure through its commercial activities. Companies should treat suppliers with respect and in a fair, reasonable way. Increased pressure on suppliers increases the likelihood that they will use forced labour. Companies should demonstrate what they are doing to mitigate these risks and show how they are reflecting on the possibility of their procurement practices exacerbating systemic pressures on suppliers.

Scoring

0 The company does not disclose any evidence of responsible procurement practices or an assessment of its procurement practices.

10 The company has a policy setting out that its employees should treat its suppliers in a fair, reasonable way, particularly with respect to labour standards and procurement.

10 The company has assessed and disclosed how its procurement practices may affect its suppliers' working conditions.

10 The company demonstrates evidence of responsible procurement practices through either external accreditation or detailed discussion of the mechanisms and schemes implemented.

10 The company discloses how it calculates and factors in legal and full labour cost production and sourcing costs to avoid the need for labour arbitrage.

Maximum achievable score: 40

Explanatory notes

- To score maximum points, companies must meet all four scoring criteria.
- Companies must explicitly commit to treating their suppliers fairly. Supplier codes of conduct do not necessarily fulfil this purpose, as they often set out the responsibilities placed on suppliers without reciprocal commitments from companies.
- Companies could consider the following factors when assessing their own impact on suppliers' working conditions: aggressive pricing, late or extended payments, short lead times, and withdrawing from contracts at the last minute. Further examples can be found in section 4.4 of the TISC guidance.[22]
- The final criterion asks companies to demonstrate whether their pricing model allows suppliers to afford to pay their workers a living wage. Companies must disclose their costing methodology, demonstrating that full (living-wage) labour costs are factored in, and show how they negotiate prices with suppliers.

Changes to note

Two criteria (the second and fourth) have been added, both asking companies to reflect on how their procurement practices may exacerbate poor working conditions at their suppliers' locations.

One criterion, concerning provision of an anonymous supplier feedback mechanism on procurement practices, was removed.

NEW

Question 53

Does the company discuss its safe and responsible engagement with individuals and organisations with lived experience of modern slavery, and does it ensure this engagement influences its due diligence processes and modern slavery policies?

Corresponding standards

BHRC 2.2; Home Office 'TISC' guidance (2025); KTC 1.3; S2G (see also ETI)

Rationale

Engaging with workers and those with lived experience of exploitation will help companies to understand the risks posed to workers and conduct effective due diligence. There is increasing evidence that meaningful engagement of people with lived experience of modern slavery improves policies and programmes designed to tackle modern slavery and its causes.

Scoring

0 The company has not taken intentional steps to engage with individuals with lived experience and/or there is no evidence that this engagement has influenced the company's modern slavery due diligence processes and policies.

10 The company has taken intentional steps to engage with individuals with lived experience and this engagement has influenced the company's modern slavery due diligence processes and policies.

Maximum achievable score: 10

Responsible engagement

While engaging individuals is important, companies should consult with experts before doing so. Non-governmental organisations can advise on how to engage in a trauma-sensitive manner and offer guidance on other crucial ethical processes, including confidentiality, anonymity, safeguarding and compensation.

Question 54

Does the company disclose a governance structure that provides senior-level oversight and management of its modern slavery approach?

Corresponding standards

BHRC 2.2; Home Office 'TISC' guidance (2025); KTC 1.3; S2G (see also ETI)

Rationale

Modern slavery risks are comprehensive and require coordination across the business. It is important to have buy-in at executive level and accountability among board members, to enable modern slavery to be tacked throughout the business.

Scoring

0	The company does not disclose senior-level oversight and accountability for its modern slavery approach.
10	The company discloses senior-level oversight and accountability for its modern slavery approach.

Maximum achievable score: 10

Question 55

Does the company disclose who is responsible for the implementation of its modern slavery approach?

Corresponding standards

BHRC 2.2; Home Office 'TISC' guidance (2025); KTC 1.3; S2G (see also ETI)

Rationale

Executive oversight is important. However, for there to be an effective modern slavery process, there need to be people responsible for driving the work forward.

Scoring

0	The company does not disclose who is responsible for its modern slavery approach.
10	The company discloses who is responsible for its modern slavery approach.

Maximum achievable score: 10

Explanatory notes

- The functions covered by this question are developing human rights due diligence policies and processes, conducting risk assessments, responding to violations, setting key performance indicators and mapping the supply chain.
- Companies can score these points either by disclosing that they have a human rights team or by naming the individual departments responsible for each function and how they are coordinated.

Changes to note

Companies must now make clear which teams or individuals are responsible for implementing each part of their modern slavery approach (unless they have a centralised human rights team).

NEW

Question 56

Does the company provide evidence that findings from its monitoring and evaluation have fed into and influenced its business practice?

Corresponding standards

Home Office 'TISC' guidance (2025)

Rationale

Companies should be continually evaluating their modern slavery approach and demonstrating how they have incorporated lessons learned into their practices.

Scoring

0 The company does not identify lessons learned from its modern slavery approach and/or does not explain how it has incorporated these into its wider business practices and/or supplier management.

10 The company identifies lessons learned from its modern slavery approach and explains how it has incorporated these into its wider business practices and/or supplier management.

Maximum achievable score: 10

Key

BHRC	Business and Human Rights Centre methodology for assessing transparency in supply chains statements[23]
EPP	Employer Pays Principle[24]
ETI	Ethical Trading Initiative's 'Access to remedy' guidance for companies[25]
Home Office 'TISC' guidance (2025)	UK Home Office's 2025 guidance on transparency in supply chains (TISC) in relation to the UK Modern Slavery Act 2015[26] Alignment with the Home Office's TISC guidance is referenced whenever a question aligns with a Level 1 bullet point, a Level 2 bullet point, a 'key action to consider' or other text throughout the guidance (see page 7 for further information)
ILO Core Conventions	International Labour Organisation Core Conventions[27]
IRBC	Sociaal-Economische Raad's paper on enabling remediation[28]
KTC	KnowTheChain assessment methodology[29]
OECD Guidelines for Multinational Enterprises	Recommendations from the Organisation for Economic Co-operation and Development for multinational enterprises[30]
S2G	Stronger Together's 'Tackling modern slavery in global supply chains' toolkit[31]
UNGPs	UN Guiding Principles on Business and Human Rights[32]
UNGPRF	UN Guiding Principles Reporting Framework[33]

Endnotes

1 International Labour Organization (2022), 'Global estimates of modern slavery: forced labour and forced marriage', online at www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage

2 UK Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible

3 CCLA (2023), 'Modern Slavery UK Benchmark 2023', online at www.ccla.co.uk/sites/default/files/2024-07/Modern%20Slavery%20UK%20Benchmark_8b.pdf

4 CCLA (2024), 'Modern Slavery UK Benchmark 2024', online at www.ccla.co.uk/documents/modern-slavery-uk-benchmark-2024/download?inline=true

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6 CCLA (2025), 'Modern Slavery Global Benchmark pilot', online at www.ccla.co.uk/documents/ccla-modern-slavery-global-benchmark-2025-pilot/download?inline=1

7 Modern Slavery Act 2015, online at www.legislation.gov.uk/ukpga/2015/30/contents

8 UK Home Office (2021), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide#full-publication-update-history

9 CCLA (2026), 'Modern Slavery Global Benchmark 2025', online at www.ccla.co.uk/documents/modern-slavery-global-benchmark-2025/download?inline=

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