Modern Slavery UK Benchmark 2025

CCLA

GOOD INVESTMENT

Contents

Illustrations by Pamela Bentley

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The construction, scoring and compilation of the benchmark remain the responsibility of CCLA.

Foreword

Earlier this year our Joint Committee on Human Rights explored the issue of forced labour in supply chains reaching the UK. We found evidence that goods which are produced or part-produced with forced labour are being sold to consumers in the UK – including cotton, processed tomatoes, fish, solar panels and critical minerals.[1]

We also found that the patchwork of legislation was not preventing goods linked to forced labour from entering the UK market. In particular, we heard evidence that the requirement in the Modern Slavery Act for commercial organisations with a turnover exceeding £36 million a year to make a slavery and human trafficking statement for each financial year was not effective in preventing forced labour in supply chains. It was therefore encouraging to hear that the government is considering how to strengthen this legislation, including the reporting requirements, the turnover threshold and penalties for non-compliance.

However, our committee went further and recommended new legislation to mandate corporates to undertake due diligence; an import ban on goods linked to forced labour; and a 'duty to prevent' to establish civil liability for companies that do not take adequate steps to prevent forced labour in their supply chains. We await the government's response to our recommendations.

While it is clear that new legislation is required, it is encouraging to see the current legislation being used by CCLA to hold UK companies to account. This CCLA benchmark assesses not only companies' modern slavery statements but also their performance in finding modern slavery and addressing it in line with the UN Guiding Principles on Business and Human Rights.

I warmly welcome this third modern slavery benchmark of the top UK companies. The assessments show that 60 companies increased their score compared with the 2024 benchmark. However, the report also shows that even among top companies there is considerable room for improvement, particularly when it comes to remediating victims for the harms they have suffered.

Lord Alton of Liverpool
Chair of Joint Committee on Human Rights

Executive summary

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 chains.[2] 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.

This is why we are proud to publish the third CCLA Modern Slavery UK Benchmark. It has been designed to objectively assess how listed companies approach and manage modern slavery, based on their published information, and to encourage improved practice.

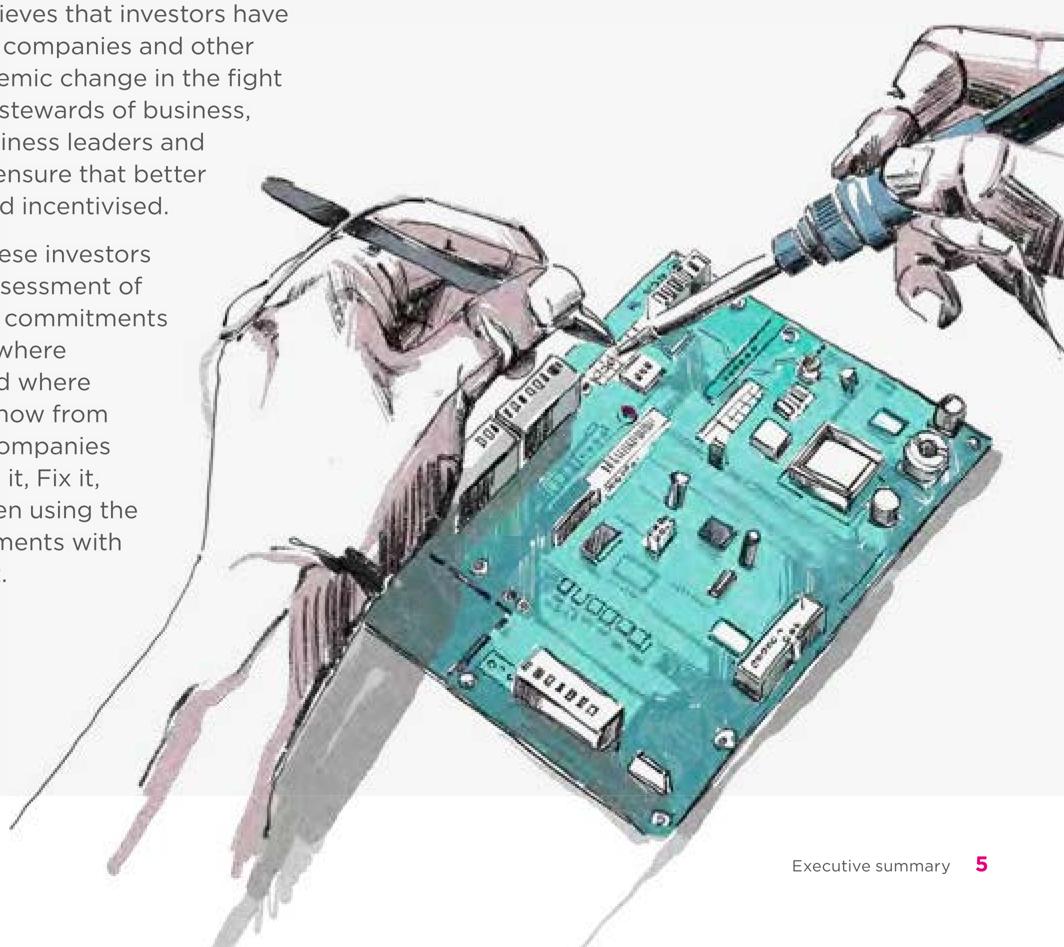
The CCLA Modern Slavery UK Benchmark is also a tool for investors. CCLA believes that investors have a key role to play in helping companies and other stakeholders to deliver systemic change in the fight against modern slavery. As stewards of business, investors can work with business leaders and engage with companies to ensure that better practices are normalised and incentivised.

The benchmark provides these investors with a regular, consistent assessment of companies' modern slavery commitments and practices, highlighting where there has been progress and where more work is needed. We know from speaking to investors and companies that investors from the Find it, Fix it, Prevent it coalition have been using the benchmark in their engagements with companies profiled within it.

In 2025, we reviewed the public disclosures of 111 UK-listed companies to evaluate their approach to finding, fixing and preventing modern slavery. This report details our findings from the benchmarking process.

This is the first time that the CCLA Modern Slavery UK Benchmark has been undertaken with aid from a large language model (LLM) in the assessment process. We have conducted comprehensive manual analysis to ensure the scoring is consistent with the manual assessments and believe that the effect of the LLM on scoring has been neutral.

While we are very proud to have seen many companies improve their benchmark scores over the past three years, the benchmark alone is not sufficient to drive systemic change on modern slavery. Transparency legislation (the UK Modern Slavery Act 2015[3]) combined with investor pressure can only take us so far. To effectively reduce the numbers of people in forced labour around the world, a suite of policy tools is required. CCLA supports the Joint Committee on Human Rights' conclusion that 'there is currently a piecemeal and ad hoc approach to addressing forced labour using domestic policy'.[4] We believe that the UK government needs to introduce mandatory human rights due diligence legislation and forced labour bans similar to those adopted by our nearest trading partners.



The benchmark

The CCLA Modern Slavery UK Benchmark has been developed in support of Find it, Fix it, Prevent it – a collaborative investor initiative on modern slavery with 70 members and £19.3 trillion in assets under management.*

The benchmark assesses the modern-slavery-related disclosures of the largest UK-listed companies on the degree to which they:

- conform with the requirements of Section 54 of the Modern Slavery Act 2015
- disclose information aligned with the Home Office guidance on modern slavery[5]
- report on finding, fixing and preventing modern slavery.

The benchmarked companies consist of the top 100 UK-listed companies by market capitalisation as of 31 March 2025, plus 11 additional companies that were in the benchmark last year and have been retained for ongoing analysis.

*As at 31 December 2024. Figures updated annually.

This is the third time CCLA has conducted the Modern Slavery UK Benchmark. The aims of the benchmark 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 companies have been assigned to one of five performance tiers to reflect the maturity of their approach to modern slavery. The results of the CCLA Modern Slavery UK Benchmark 2025 can be found on page 17 of this report. The full benchmark methodology and framework can respectively be found in Appendix 1 and Appendix 3 of this report.

In the 2024 benchmark report, we noted that the Home Office had set up the Forced Labour Forum to review its guidance, last updated in 2021.[6] CCLA sat on the panel, among other representatives of government, civil society, business and academia. The updated 'Transparency in Supply Chains' guidance was published in 2025 and has significantly raised the standards for corporate human rights reporting and due diligence.[7] We are currently performing a review of the guidance to ensure that next year's CCLA Modern Slavery UK Benchmark 2026 is aligned with the new expectations.

Performance summary 2024–2025

Of the 111 benchmarked companies:

25

have improved their performance tier

These companies have improved sufficiently to move up at least one performance tier in the past year. These ‘improvers’ are concentrated in tiers 2 and 3.

60

60 have improved their score over the past year

This is slightly reduced from the 65 companies that improved their score between 2023 and 2024, but it still shows a strong trend for improvement.

6

sit in performance tier 4

Performance tier 4 is the lowest tier, given that no companies sit in performance tier 5. While it is encouraging that there continue to be no companies in the lowest tier, the six companies in performance tier 4 demonstrate that there is still work to be done on modern slavery reporting.

56

now rank in the top two performance tiers

This compares to 37 in the first benchmark, in 2023. Just over half of the benchmarked companies are now classed as either ‘leading on human rights innovation’ or ‘evolving good practice’.

Engagement summary

This year, 61% of the assessed companies engaged with the benchmarking process, which is comparable to 59% of companies engaging last year. Of the 68 companies we have engaged with since the last report was published:

- 57 only reviewed their preliminary assessment, with many providing substantive feedback.
- 8 both directly engaged with CCLA over the course of the year and reviewed their preliminary assessment.
- 3 directly engaged with CCLA over the course of the year but did not review their preliminary assessment.

Key emerging themes

1 Companies have continued to improve their disclosures despite uncertainty in the regulatory landscape

The improvement trend established last year has continued, with 60 companies increasing their score and 25 companies going up a tier in the benchmark this year. The average score has increased by 5.6 percentage points between 2023 and 2025. This is good to see, given mixed signals on human rights reporting in Europe and the changing geopolitical context.

2 More companies are reporting 'finding' modern slavery

The number of companies reporting finding modern slavery or its indicators (question 36) has once again increased this year. In total 35 companies disclosed a case of modern slavery in their operations or supply chains, including 11 that had not done so in 2024 or 2023. While many of these companies are in the consumer discretionary or consumer staples sectors, most of the companies reporting cases for the first time were from the financials, health care, industrials and utilities sectors.

3 Legislation is still needed to level the playing field

There continues to be a large gap between the highest-scoring company and the lowest-scoring company. While the materiality and salience of modern slavery risks vary across sectors, this does not explain the gap. The introduction of new statutory guidance on modern slavery disclosure in March 2025 is welcome. However, legislation is still required to provide consistency and to level the playing field internationally by strengthening the disclosure requirements of the Modern Slavery Act and mandating human rights due diligence.

4 All six companies in real estate have improved

Last year, real estate was the lowest-scoring sector in the benchmark, despite its exposure to the high-risk construction industry. This is why we chose to focus a deep dive on the sector last year, highlighting its risk profile and areas for future progress.[8] We are glad to be able to spotlight the real estate sector again this year (see page 35) for improving its scores across the benchmark. In particular, we are pleased to see companies improving their disclosures in the 'Find it' and 'Prevent it' sections of the benchmark, because this suggests that the sector is stepping up and using its influence in its construction value chain.

Recommendations

Based on the analysis of the benchmark and the themes that emerged, we make various recommendations for companies, investors and policymakers.

Companies

- Become familiar with the new requirements in the Home Office guidance on transparency in supply chains[9] and conduct a gap analysis at least against the new Level 1 requirements, which have been strengthened.
- Ensure there is strong internal governance on modern slavery – including responsibility at board level and appropriate committees or structures – and be sure to include workers' and relevant stakeholders' perspectives.
- Conduct and disclose detailed operational and supply chain risk assessments. These should include forced labour risks across supply chain locations (beyond tier one) and, importantly, direct operations. Risk assessments should go beyond desk-based assessments to include engagement with people at risk of modern slavery.
- Disclose and provide details of suspected cases of modern slavery, the steps that have been taken to provide remedy for victims, and the outcomes of this process.
- Adopt and disclose responsible procurement practices that enable suppliers to uphold the standards that are in the company's supplier code of conduct and in line with international best practices.

Investors

- Use the CCLA Modern Slavery UK Benchmark 2025 framework in engagement with portfolio companies to identify areas where a company is not performing well and where it can take additional steps.
- In line with CCLA's own practices, consider voting against the financial statements and annual reports of those companies that are in performance tiers 4 or 5 and that do not respond positively to engagement.
- Consider joining collaborative investor engagement programmes such as Find it, Fix it, Prevent it and Rathbones' Votes Against Slavery campaign.[10]

Policymakers

- Fulfil existing government commitments[11] to extend modern slavery reporting to the public sector and to introduce mandatory topics for disclosure, an annual reporting deadline and fines for non-compliance.
- Mandate companies to upload their modern slavery statements to the government's Modern Slavery Statement Registry.[12]
- Ensure that legislation on modern slavery disclosures mandates financial institutions to report on their investing and lending portfolios.
- Introduce mandatory human rights due diligence legislation and align the UK's human rights expectations with international obligations on human rights.

Companies, investors and policymakers

- Closely monitor developments in legislation on corporate sustainability due diligence in the European Union and import bans both there and in the United States.

Risk assessments

should go beyond desk-based assessments to include engagement with people at risk of modern slavery

Modern slavery global trends

Current estimates suggest that there are 50 million people trapped in modern slavery around the world, with 28 million of these in forced labour, and this number is only growing.[13] Some 86% of forced labour occurs in the private economy, and the four broad sectors accounting for the majority of total forced labour (89%) are agriculture, domestic work, industry and services.[14]

In addition to being a violation of human rights, forced labour is an economic crime. The estimated profits generated from forced labour globally are $236 billion per annum. This total is made up of wages taken from vulnerable people – many of whom are struggling to support their families – through coercive practices. For migrants, it is money taken from remittances sent home to families. For governments, it represents lost tax revenue. The profits from forced labour incentivise further exploitation, strengthen criminal networks, encourage corruption and weaken the rule of law.[15]

The economic case for tackling forced labour is clear. In 2024 the International Labour Organization calculated that the one-time cost of implementing key interventions to combat forced labour would be $212 billion, or 0.14% of global gross domestic product (GDP). In return, releasing people from forced labour and bringing them into formal employment could generate $611 billion in additional GDP. This is a threefold return on investment.[16]

When it was passed, the UK's Modern Slavery Act 2015[17] was ground-breaking in requiring businesses to report on their activities to address modern slavery. As a result, many companies discussed modern slavery at board level for the first time. However, a decade later, the Act's effectiveness is being questioned as pioneering new legislation emerges across Europe and globally.

In 2023, Germany introduced a new supply chain law requiring large companies to regularly and systematically identify and address human rights and environmental risks in their direct supply chains.[18] France's Corporate Duty of Vigilance Law 2017 now requires French businesses to publish an annual 'vigilance plan' to identify risks and prevent severe impacts on human rights.[19] Furthermore, with the Norwegian Transparency Act 2022, Norway became one of the first countries in Europe to make responsible business a legal requirement for companies.[20]

In July 2024, the European Union's Corporate Sustainability Due Diligence Directive (CSDDD) was passed.[21] This directive requires companies to carry out risk-based due diligence on human rights and environmental impacts connected to their own operations, in addition to operations of their subsidiaries and business partners. The scope includes non-EU companies with a turnover generated in the European Union of over €450 million, meaning many UK and international companies trading with EU are affected.

However, the expectations set out by the CSDDD changed in February 2025 when the European Commission published the Omnibus package, seeking to simplify the rules on sustainability.[22] In particular, this package undermines the risk-based approach by restricting CSDDD due diligence to direct business relationships. In February, the Council of Ministers further suggested that the threshold for companies in scope should be raised to €1.5 billion. The matter is currently before the European Parliament and is highly contested. It will next be subject to the trilogue process between the three EU institutions and hopefully an agreement will be reached by the end of the year.

Despite the uncertainty surrounding the CSDDD, plans for an EU forced labour ban remain on course for implementation in 2027. This ban, approved in April 2024, would enable the European Union to prohibit the sale, import and export of goods made using forced labour.[23]

For business and human rights specialists, it is tempting to focus myopically on legislative changes in Europe alone. However, countries in the Asia-Pacific are also beginning to address modern

$611 billion

could be generated in additional GDP by bringing people into formal employment

slavery risks. Though these countries have some of the largest prevalences of modern slavery globally, they have historically had weak governmental policy aimed at tackling it. Countries such as Indonesia, Japan, South Korea and Thailand are beginning to address this issue – for example, Thailand has drafted a Mandatory Human Rights Due Diligence law[24] and Japan introduced a voluntary Respecting Human Rights in Responsible Supply Chains framework in 2022[25]. Furthermore, Australia has recently announced a significant upgrade to its Modern Slavery Act 2018, with the possible introduction of mandatory human rights due diligence.[26]

In the United States, there are some signs that tackling forced labour remains a bipartisan issue, with Secretary of State Marco Rubio having been a sponsor of the 2021 Uyghur Forced Labor Prevention Act, introduced by the Biden administration. Between January and October 2025, US Customs and Border Protection stopped 10,478 shipments of products valued at $890 million under the Uyghur Forced Labor Prevention Act.[27] As of October 2025, there were 53 active withhold and release orders under the Tariff Act (1930) on goods in categories as diverse as agriculture and prepared products; apparel; automotive and aerospace; base metals; consumer products; electronics; industrial and manufacturing materials; machinery; and pharmaceuticals, health and chemicals.[28] The Trump administration has also removed the de minimis exemption rule, which allowed shipments valued less than $800 into the country duty free and with little scrutiny. This means that Chinese e-commerce companies such as Shein and Temu, which have faced accusations of being linked to forced labour, now face tariffs, significantly hampering their low-cost business model.

There has also been some recent momentum in the UK. On 24 March 2025, the Home Office published its updated and expanded ‘Transparency in Supply Chains’ guidance on how businesses should comply with Section 54 of the Modern Slavery Act 2015.[29] The new guidance emphasises the importance of companies committing to continuous improvement in their modern slavery due diligence and makes clear that audits should be accompanied by worker-centred practices. The guidance indicates organisations should comply with both the spirit and the letter of the Modern Slavery Act 2015, it is encouraging businesses to become more reflective, acknowledging their blind spots and weaker areas.[30]

Regulations shaping the human rights landscape

Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023

US Uyghur Forced Labor Prevention Act 2021

European Union Corporate Sustainability Due Diligence Directive 2024

French Corporate Duty of Vigilance Law 2017

German Act on Corporate Due Diligence Obligations in Supply Chains 2023

Netherlands HREDD Law 2021

Norwegian Transparency Act 2022

Swiss Ordinance on Due Diligence and Transparency 2021

UK Modern Slavery Act 2015

Australian Modern Slavery Act 2018

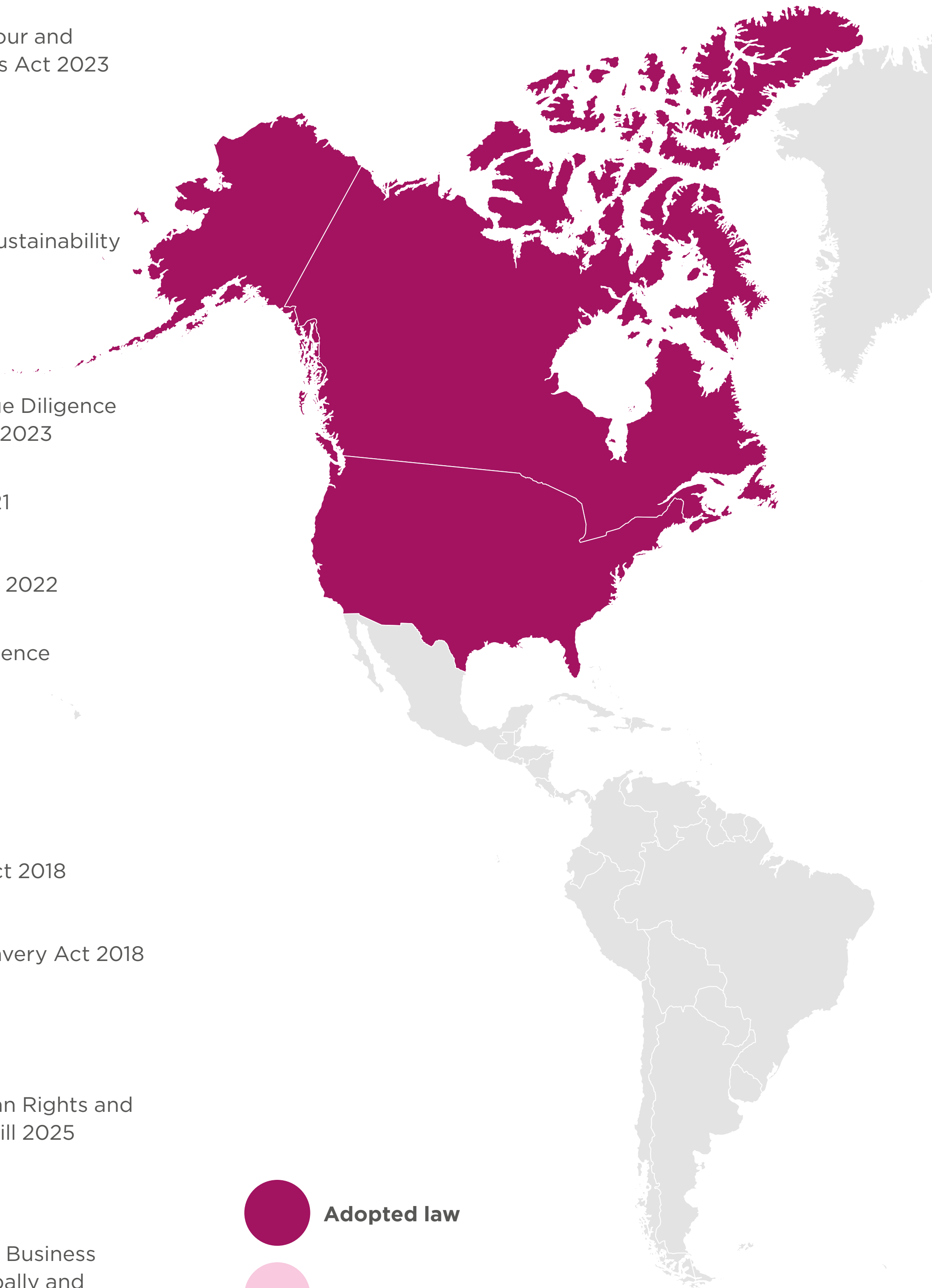
New South Wales Modern Slavery Act 2018

New Zealand's Plan of Action

South Korea Corporate Human Rights and Environment Due Diligence Bill 2025

UN

Soft Law
The UN Guiding Principles on Business and Human Rights apply globally and Organisation for Economic Co-operation and Development (OECD) guidelines apply for multinational enterprises from the OECD member countries.



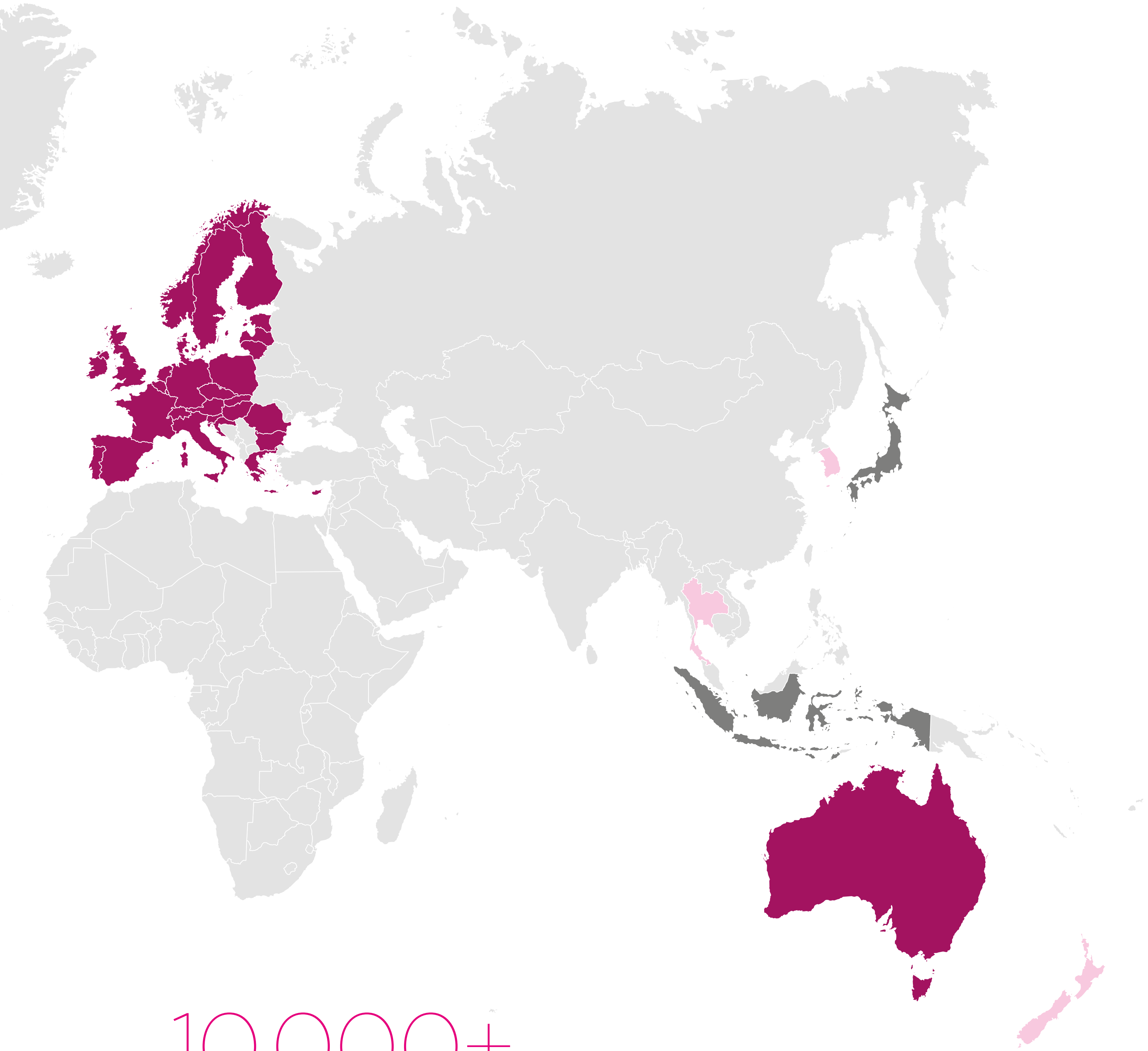
Adopted law

Political process

Policy statements & public discussions

$236 billion

is generated every year in illegal profits from forced labour



10,000+

shipments of products stopped under the Uyghur Forced Labor Prevention Act

In addition, the Great British Energy Act passed through Parliament on 15 May 2025.[31] It includes measures to ensure that forced labour does not take place in Great British Energy's business or supply chains. The Energy Act builds on the Procurement Act 2023, which enables public bodies to reject bids and terminate contracts with suppliers that use forced labour, and the Health and Care Act 2022, which bans the National Health Service from purchasing goods and services tainted by forced labour.[32] The new Energy Act means that the state-owned energy company will, in particular, not be able to purchase and use solar panels linked to Chinese slave labour. The production of these, particularly in the Xinjiang region, has been linked to the alleged exploitation of Uyghur Muslims.[33] This is promising progress in introducing new anti-modern slavery precedents, with state-owned companies taking responsibility for preventing the use of forced labour in their own supply chains.

These changes to the UK's modern slavery legislation are positive. However, without new and stronger legislation, the UK still risks falling behind.[34] This was highlighted by the House of Lords Modern Slavery Act 2015 Committee, which published a report in October 2024 that identified areas where the UK has fallen out of step with other counties on its approach to modern slavery legislation. Equally, a more recent report by the Joint Committee on Human Rights called for mandatory human rights due diligence and forced labour bans, including on state forced labour. Even with the Omnibus package, the UK urgently needs to align its legislation with international human rights expectations, or risk becoming a laggard.

LEGAL IMPLICATIONS AND INCREASED RISKS FOR UK-HEADQUARTERED COMPANIES

In the past year, lawsuits filed against Dyson over alleged forced labour in its Malaysian supplier factories has created legal implications and risks for UK-headquartered companies with global supply chains in countries at high risk for modern slavery.

In December 2024, the UK Court of Appeal ruled that allegations of forced labour and abuse at Malaysian factories supplying Dyson could be heard in the UK courts.[35] The case was brought by 23 migrant workers from Bangladesh and Nepal as well as the estate of a deceased worker; they allege forced labour, false imprisonment, assault and battery over periods of up to nine years. Dyson argued that the case should be heard in Malaysia, but the claimants believed that there were risks to accessing justice in that country. The court agreed, citing the vast power imbalance between the vulnerable claimants and Dyson as a key reason to proceed in the UK. The Supreme Court has since refused Dyson permission to appeal.[36]

The abusive working conditions in the Malaysian factories were first broadcast by Channel 4 News in 2022.[37] Dyson disputes the claim that it was negligent, saying that it investigated claims of abusive labour practices and determined that they were not substantiated in 2019. However, in 2021 the company cut ties with factories after an audit found issues.

The Court of Appeal decision and Supreme Court support create a strong precedent making it difficult for UK-headquartered companies to challenge jurisdiction in claims relating to human rights, labour abuses and environmental claims abroad. The substantive case remains to be heard, so we do not yet know whether Dyson will be found liable.

Company ranking

The companies in the benchmark were selected based on their market capitalisation, previous inclusion in the benchmark and whether they are in the scope of the Modern Slavery Act 2015. All are UK-listed.

This year, we assessed 111 companies (compared to 110 in 2024). Five companies were removed – Darktrace, Dechra Pharmaceuticals, DS Smith, Hargreaves Lansdown and Smurfit Kappa Group – due to corporate actions or changes to location of listing. We added six new companies: Babcock International Group, Games Workshop, Harbour Energy, IG Group, ITV and Softcat. Companies that have dropped out of the top 100 by market capitalisation are retained in the benchmark for two additional years to assess their ongoing progress.

The companies represent 11 industry sectors, which are classified using the Global Industry Classification Standard (GICS) as communication services, consumer discretionary, consumer staples, energy, financials, health care, industrials, information technology, materials, real estate and utilities.

Framework

The company assessments and quality assurance took place in July and August 2025 based on information that was publicly available as of 16 July. Company disclosures were analysed using a hybrid approach employing a large language model to assess large volumes of corporate disclosures, combined with human quality assurance. All companies were invited to review their preliminary assessments in August before the scores were finalised in September.

The benchmark assesses companies against 48 assessment criteria and has a total of 62 points. This framework was developed from CCLA's Find it, Fix it, Prevent it initiative, which was created to guide investors' engagements with companies. It is based on the UN Guiding Principles on Business and Human Rights and draws on existing best practice developed by the Business and Human Rights Resource Centre, the UK Ethical Trading Initiative and KnowTheChain.

The criteria cover five sections:

- Modern Slavery Act compliance and registry
- Conformance with Home Office guidance[38]
- Find it
- Fix it
- Prevent it.

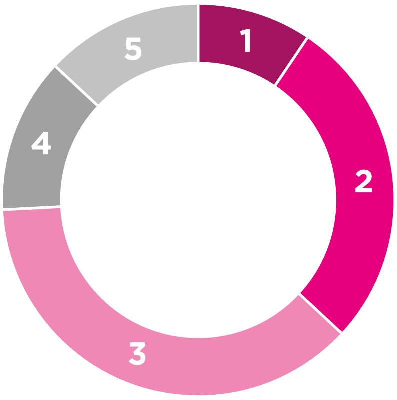
Each section is weighted as illustrated on the next page (see Appendix 3 for the full benchmark assessment criteria). This weighting reflects our belief that 'finding' modern slavery is the hardest task but matters most.

The rankings are based on each company's overall score as a percentage of the maximum points available.

Companies are ranked across five performance tiers (set out below). This enables us to evaluate the maturity of their approach to modern slavery.

In 2025 we revised the boundaries for tiers 4 and 5. Previously, companies without a modern slavery statement were categorised as tier 5, and companies scoring between 0–40% were in tier 4. This has been amended to reflect the CCLA Modern Slavery Global Benchmark pilot project.[39] Now, companies scoring 21–40% are in tier 4 and companies scoring 0–20% are in tier 5.

For more details on the methodology and companies assessed, see Appendices 1 and 2 respectively.



1 Modern Slavery Act compliance and registry
10%

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 Conformance with Home Office Guidance
27%

Derived from the Home Office's guidance on transparency in supply chains, updated in 2021. The section reflects what the UK government believes a good modern slavery statement should contain.

3 Find it
37%

Covers corporate business and human rights due diligence processes and efforts to find, assess and measure the risks of modern slavery in supply chains. This section also examines whether companies have disclosed modern slavery.

4 Fix it
13%

Covers companies' efforts to provide remediation to victims of modern slavery.

5 Prevent it
13%

Covers companies' efforts to prevent the occurrence of modern slavery in their operations and supply chains. This section examines areas including governance, purchasing and recruitment practices, and resources for implementation.

PERFORMANCE TIERS

Performance tier	Percentage score	Tier description
1 **Leading on human rights innovation**	81–100	An evolved and mature approach to human rights due diligence. There are extensive discussions of the risks of modern slavery, case studies on systemic modern slavery risks in the sector, and discussions of meaningful activities to find, fix and prevent modern slavery.
2 **Evolving good practice**	61–80	Evidence can be seen of human rights due diligence practices on modern slavery informed by experts and/or civil society partners. There is evidence of activity in the Find it, Fix it and Prevent it categories.
3 **Meeting basic expectations**	41–60	The company meets and exceeds minimum expectations – for instance, by undertaking risk assessments for its business and supply chains, communicating regularly with suppliers on modern slavery risks, providing relevant training to staff, and monitoring efficacy. There is also evidence of whistleblowing mechanisms. However, the due diligence processes could be improved to ensure they are fully capturing the risks to the business and rights holders.
4 **Developing approach**	21–40	The company has relevant policies, but there is little evidence of sufficient human rights due diligence. For instance, risk assessment processes are primarily desk-based and focused on compliance.
5 **Unsatisfactory**	0–20	The company has a limited modern slavery approach. It may not have an in-date modern slavery statement.

Benchmark results

1 Leading on human rights innovation
12 companies

- Associated British Foods
- British American Tobacco
- ▲ Burberry Group
- Imperial Brands
- ▲ InterContinental Hotels Group
- J Sainsbury
- Kingfisher
- Marks & Spencer Group
- NEXT
- Reckitt Benckiser Group
- Tesco
- Unilever

2 Evolving good practice
44 companies

- ▲ Admiral Group
- Anglo American
- AstraZeneca
- ▼ Aviva
- BAE Systems
- ▲ Barclays
- ▲ Berkeley Group Holdings
- ▲ BP
- BT Group
- Bunzl
- Centrica
- Compass Group
- ▲ Croda International
- Diageo
- Entain
- ▲ Fresnillo
- Glencore
- Haleon
- Informa
- International Consolidated Airlines Group
- Intertek Group
- ▲ Investec
- JD Sports Fashion
- Legal & General Group
- Lloyds Banking Group
- ▲ London Stock Exchange Group
- Mondi
- National Grid
- NatWest Group
- Ocado Group
- ▲ Phoenix Group Holdings
- RELX
- ▲ Rentokil Initial
- ▼ Rio Tinto
- ▲ Rolls-Royce Holdings
- ▲ Schroders
- ▲ Smiths Group
- ▲ Spirax Group
- SSE
- ▲ St James's Place
- ▲ Standard Chartered
- United Utilities Group
- Vodafone Group
- Whitbread

3 Meeting basic expectations
49 companies

- ▼ Aberdeen Group
- ▲ Airtel Africa
- Antofagasta
- Ashtead Group
- ▲ Auto Trader Group
- ○ Babcock International Group
- Barratt Redrow
- Beazley
- British Land
- Carnival
- Coca-Cola HBC
- Convatec Group
- ▼ CRH
- DCC
- easyJet
- Endeavour Mining
- ▼ Experian
- Flutter Entertainment
- Frasers Group
- ○ Games Workshop
- ▼ GSK
- Halma
- ○ Harbour Energy
- Hikma Pharmaceuticals
- Hiscox
- ▲ Howden Joinery Group
- HSBC Holdings
- ICG
- IMI
- ○ ITV
- Land Securities Group
- ▼ M&G
- ▲ Melrose Industries
- Pearson
- Persimmon
- Prudential
- Rightmove
- ▲ Sage Group
- SEGRO
- ▼ Severn Trent
- Shell
- Smith & Nephew
- ○ Softcat
- Taylor Wimpey
- ▲ Tritax Big Box REIT
- Unite Group
- ▲ Vistry Group
- Weir Group
- WPP

4 Developing approach
6 companies

- ▼ 3i Group
- B&M European Value Retail SA
- Diploma
- ○ IG Group
- LondonMetric Property
- Wise

5 Unsatisfactory
0 companies

Key:

- ▲ Up one tier
- ▼ Down one tier
- ○ New to the benchmark
- | Engaged with benchmarking process
- Communication services
- Consumer discretionary
- Consumer staples
- Energy
- Financials
- Health care
- Industrials
- Information technology
- Materials
- Real estate
- Utilities

Performance analysis

Tier distribution

The chart below shows the changes in the numbers of companies in each performance tier since the benchmark was launched.

It is positive to see that just over half of the companies assessed in 2025 are in the top two performance tiers and there are only six companies left in performance tier 4. To move out of performance tier 4, companies need to go beyond legal compliance (assessed in sections 1 and 2 of the benchmark) and have some form of modern slavery risk assessment.

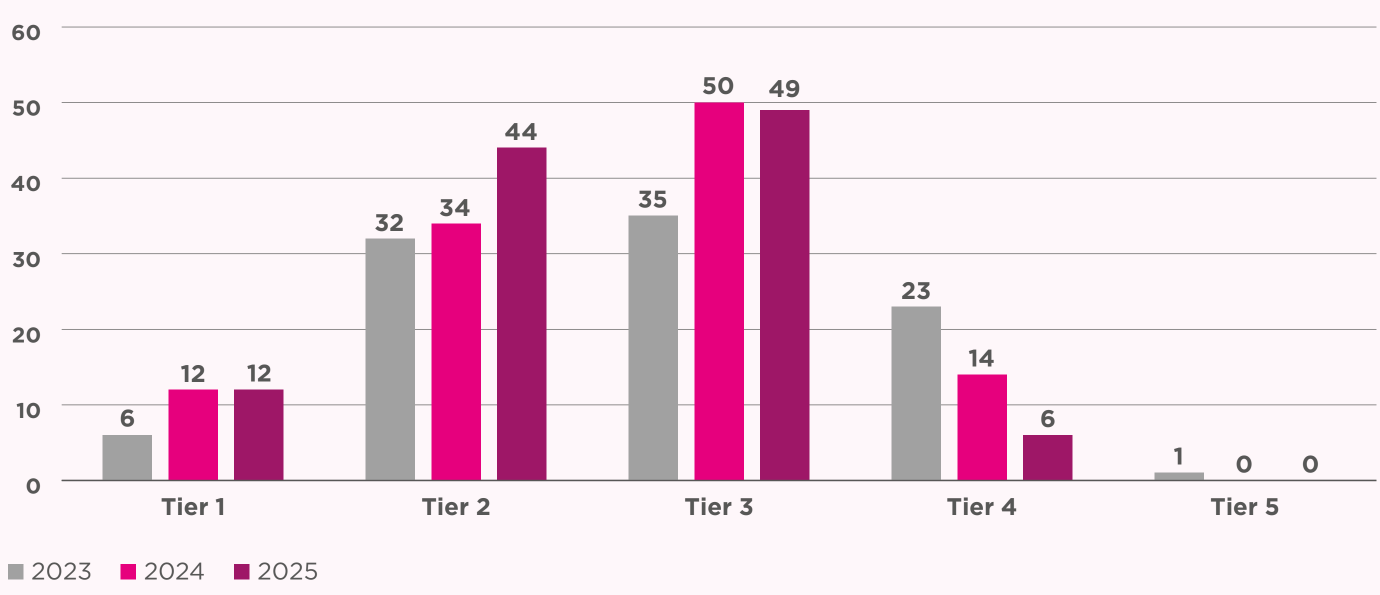
Average scores

There has been an increase in the average score since last year. In 2025, the average score was 59.6%, up from 58.5% in 2024. Although not as sharp an increase as last year, when the benchmark average increased by 4.5 percentage points, this positive trend shows that companies are continually improving their modern slavery disclosures and activities.

This trend is even more apparent for the 94 companies that have been in the benchmark since 2023. Their average score has increased from 54% in 2023 to 62% in 2025. The average 'trend' company has now moved up into performance tier 2, showing significant progress. These companies have comprehensive due diligence processes that incorporate expert and civil society voices.

The highest score achieved by a company this year was 94% and the lowest was 32%. The lowest score has steadily been increasing over the past three years, from 10% to 27% to 32%, which suggests that the lowest-scoring companies have dedicated increased resources to their modern slavery approach. The highest score has remained relatively static, which likewise suggests that the top-performing companies have continued in their good practice.

PERFORMANCE TIER DISTRIBUTION



Company improvements 2024–2025

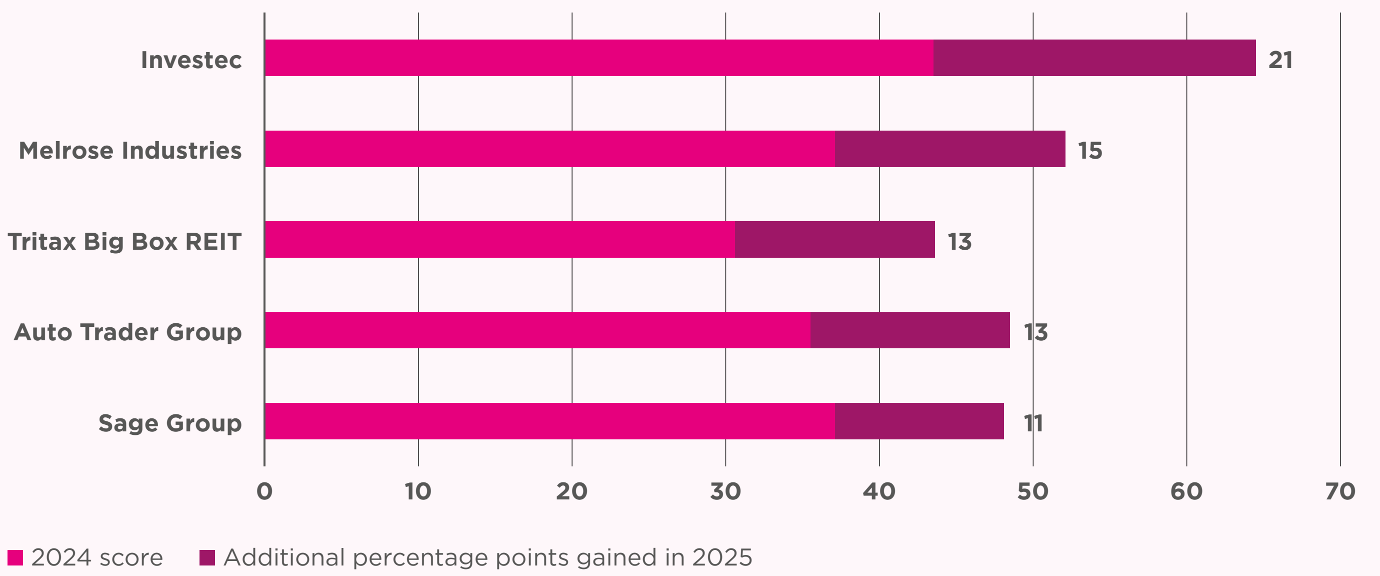
Across a wide range of tiers and sectors, there were significant improvements in company performance. A total of 25 companies improved by one performance tier.

The graph below shows the five companies with the largest percentage point change in their score between 2024 and 2025. Each of these companies improved by one performance tier in the 2025 benchmark.

25 companies

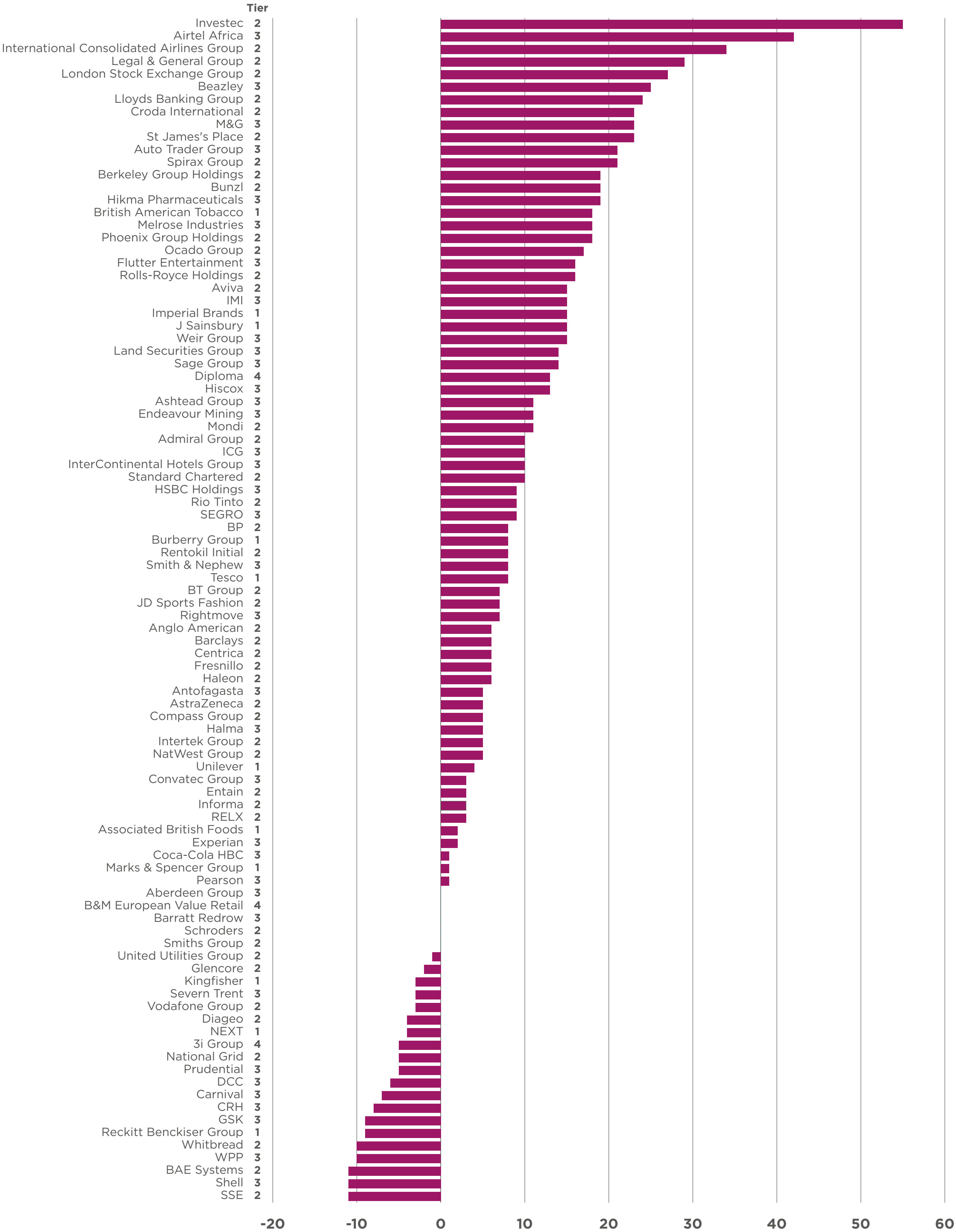
improved by one performance tier

MOST IMPROVED COMPANIES 2024–2025 BY PERCENTAGE POINTS



Trend company analysis 2023–2025

The chart below shows the percentage point changes in score over the past three years for the 94 companies that have appeared in the benchmark since its inception in 2023. The companies' 2025 performance tiers are indicated on the left.



Section analysis

Overview

The best-performing section of the benchmark remains 'Modern Slavery Act compliance and registry', with an average score of 92%. Given the low bar to comply with the Modern Slavery Act 2015, this is unsurprising. However, it suggests that further legislation could have a strong, positive impact in incentivising corporate disclosure.

'Conformance with Home Office guidance' is still a high-performing section in the benchmark, although there was a small slip in performance this year. The deterioration is the result of a methodological change, to consider contract labour as part of the 'labour' supply chain. See page 25 for a more detailed explanation of our approach. Nevertheless, the section's generally high performance (84%) is in keeping with the year-on-year trend.

Following a slight deterioration in the 'Find it' average score in 2024, it is encouraging to see that this section has improved this year, up to an average score of 48%. This has largely been driven by companies demonstrating their increased visibility of their supply chains and participating in further worker and multi-stakeholder engagement initiatives.

As in previous years, the lowest-scoring section was 'Fix it', with an average of 20%. In 'Fix it', points are primarily awarded for disclosing actions taken to remedy cases of modern slavery. Indeed, to gain most of the points in this section, a company needs to disclose a case of modern slavery that has been found in its operations, supply chain or value chain.

However, there has been a crucial improvement in 'Fix it'. In 2025, 35 companies disclosed finding a case of modern slavery, 15 of which had not disclosed a case in 2024. Reporting cases of modern slavery is valuable for investors and other stakeholders as it demonstrates a company's commitment to transparency, accountability and remedy. CCLA believes that, given the scale of forced labour in the private economy and the interdependencies of global supply chains, all large, listed companies should be able to find modern slavery in their business activities.

35 companies

disclosed finding a case of modern slavery, 11 of which had not disclosed a case in 2024 or 2023

Finally, 'Prevent it' has demonstrated the most consistent year-on-year improvement. Since 2023, its average score has increased from 40% to 51% to a high of 58% this year. This demonstrates that companies have increased their focus on their modern slavery governance systems and the mechanisms used to treat suppliers fairly.

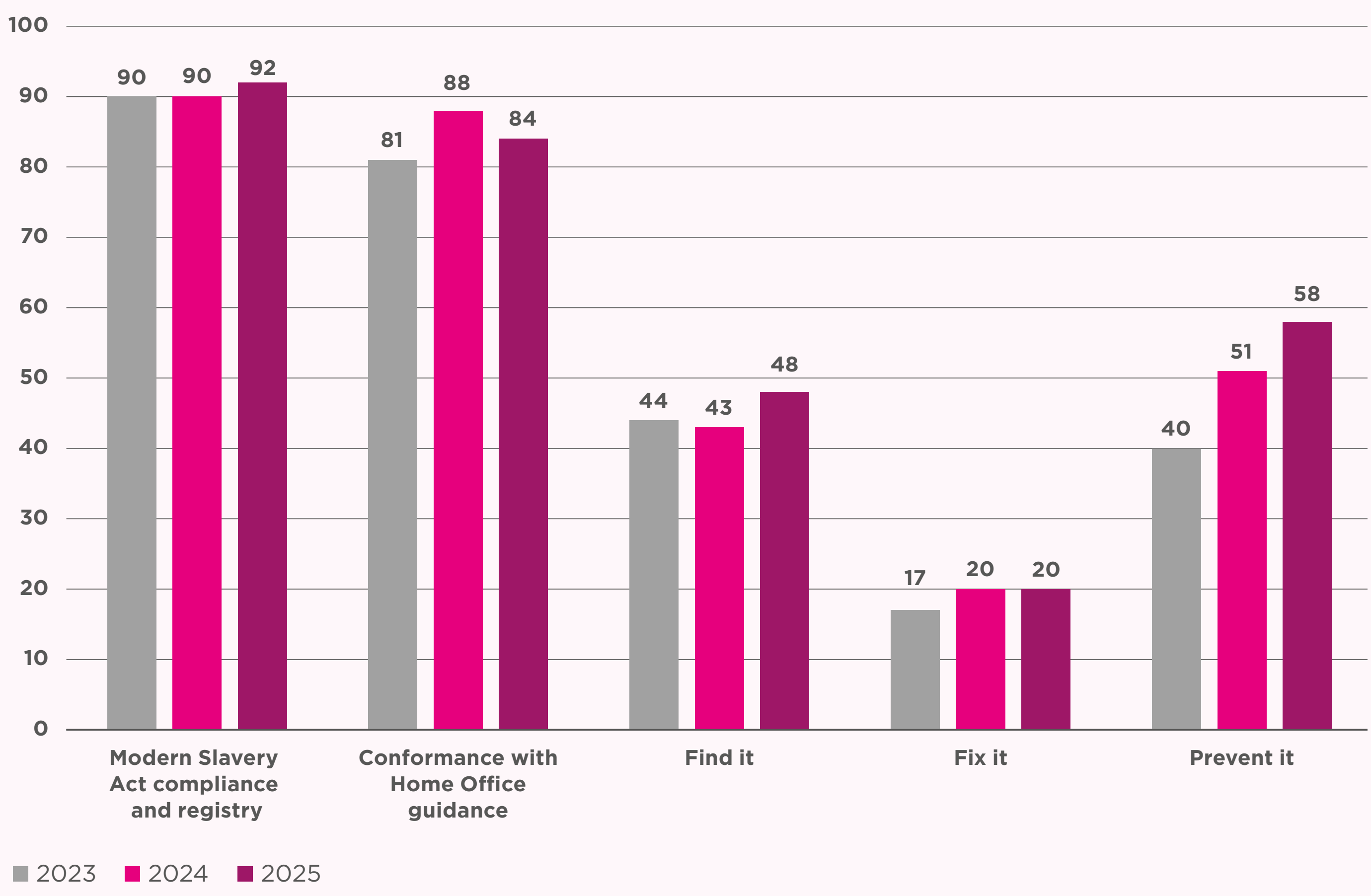
While the improvements in 'Prevent it' are encouraging, they emphasise a consistent theme throughout all three benchmark sections: there remains a focus on policy rather than practical activity to tackle modern slavery. The lowest-scoring sections in the benchmark – 'Find it' and 'Fix it' – emphasise company action, rather than commitments and disclosure. For more information on the benchmark criteria, see Appendix 3.

The chart below shows the average scores for each section of the benchmark.

The increase

in the 'Find it' average score has largely been driven by companies demonstrating their increased visibility of their supply chains

MEAN PERCENTAGE SCORE BY SECTION 2023–2025



GOOD PRACTICE CASE STUDY
IHG HOTELS & RESORTS

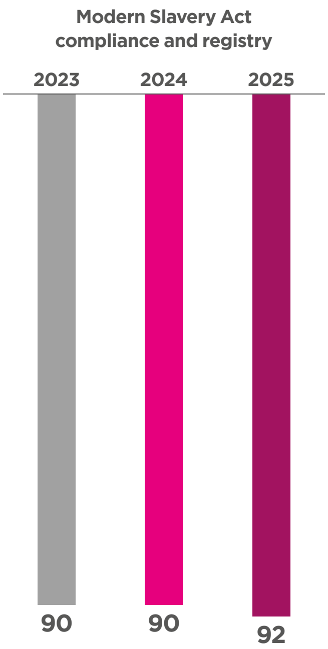
"At IHG, respecting human rights is fundamental to how we conduct responsible business. We are committed to helping eradicate modern slavery, recognising that transparency, collaboration and continuous improvement are essential to achieving meaningful progress.

In 2024, we made significant progress in strengthening how we identify and address risks faced by migrant workers across our hotels. We tested a new digital self-assessment for our Responsible Labour Requirements, enabling the centralised collection of key data – such as reliance on migrant labour and the use of labour suppliers. This enhanced our understanding of risk and improved visibility of completion rates and corrective actions across hotels. We also partnered with an external consultancy to conduct on-site assessments in selected hotels in the Middle East. These assessments prioritised engagement with rightsholders, with more than 300 workers taking part in interviews. Their insights provided valuable feedback on the effectiveness of our responsible labour programme and helped identify areas for further improvement.

This year, our focus has been on scaling up the digital self-assessments and addressing findings from the on-site assessments. Recognising that modern slavery is a complex and often hidden issue requiring proactive effort to uncover, we remain dedicated to strengthening our due diligence processes, fostering greater collaboration within our industry and beyond, and sharing our learnings to drive positive change."

Samah Abbasi
Human Rights Director,
IHG Hotels & Resorts

Section 1: Modern Slavery Act compliance and registry



This section of the CCLA Modern Slavery UK Benchmark is mostly derived from the statutory requirements of the Modern Slavery Act 2015.

There are five statutory requirements covered:

- publishing a modern slavery statement annually
- having a clearly labelled link to the statement on the company homepage
- having the board approve the statement
- having a director sign the statement
- providing an explanation of the steps the company has or has not taken to combat modern slavery.

Additionally, this section addresses whether companies have uploaded their statement to the Modern Slavery Statement Registry.[40] While this is not currently a statutory requirement, the guidance strongly encourages companies to do so. Last year, our report highlighted an improvement in the number of companies uploading their statement to the registry. This trend has continued in 2025, with 78% of companies uploading their statement to the registry, compared to 71% in 2024. More companies are now improving their disclosures through publishing their statements to the registry.

Given that this section covers regulatory requirements, it is not surprising that it remains the highest scoring, with 61% of companies scoring 100%. There was only one company that did not have its statement approved by the board. Given this encouraging picture – where the majority of companies are compliant with the Modern Slavery Act 2015 – further legislation may help to maintain and further improve the standard in disclosures.

Section 2: Conformance with Home Office guidance

This section of the CCLA Modern Slavery UK Benchmark is derived from Home Office guidance.[41] The statutory guidance indicates what the UK government believes a good modern slavery statement should contain.

In the previous benchmark report, we noted that the Home Office had set up the Forced Labour Forum to review its guidance, last updated in 2021. CCLA sat on the panel, among other representatives from government, civil society, business and academia. The updated 'Transparency in Supply Chains' guidance was published in 2025 and has significantly raised the expected standard for corporate human rights reporting and due diligence.[42] We are currently performing a review of the guidance to ensure that next year's CCLA Modern Slavery UK Benchmark 2026 is aligned with the new expectations.

Companies generally scored well in this section. This demonstrates that where government does provide guidance, companies take note and are more likely to comply. We therefore welcome the updated guidance.

We were pleased to see a slight increase in the number of companies disclosing where there are modern slavery risks in their supply chain (question 14) and the steps taken to risk assess their supply chains (question 17). In general, we continue to see that companies tend to focus on their supply chains rather than their direct operations when assessing the risk of modern slavery.

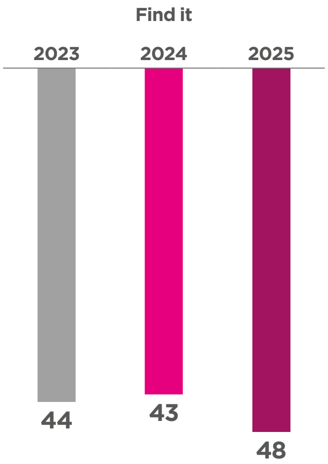
We also observed a reliance on desk-based tools used to manage the risk of modern slavery in supply chains (question 18). More specifically, 37% of companies manage their supply chain risk through a combination of grievance mechanisms, annual compliance checks and modern slavery clauses in their contracts. A further 18% combine desk-based tools with supplier engagement and training on modern slavery.

This year, we saw a decrease in the number of companies scoring full points for giving information about their business (question 8), as we are now asking for more specific information about the environment in which workers operate. The percentage of companies scoring the second point available for this question this year fell from 94% to 68%. We also saw a drop in companies scoring for reporting their effectiveness in eliminating modern slavery (question 19), from 68% to 57% of companies. This reflects a slight change in the criteria for this question: whereas companies were awarded the point for naming their targets last year, we are now looking for evidence of reporting against those targets.

EXPLANATION
BUSINESS AND SUPPLY CHAIN

In 2025, we have made the distinction between the business and the supply chain more specific, particularly concerning the use of contract and temporary labour. Where companies have disclosed risks linked to the use of contract labour – such as in facilities management, security or cleaning – these have been treated as related to the labour supply chain. However, where temporary workers are engaged in core business activities – such as when supermarkets hire seasonal staff – we have treated these disclosures as risks in a company's direct operations.

The sharpening of this distinction is reflected in the change of some scores for the questions concerning risks in the business (questions 13, 15 and 16) and supply chain (questions 14, 17 and 18).



Section 3: Finding modern slavery

The 'Find it' section of the CCLA Modern Slavery UK 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. Companies that have not found modern slavery may not be looking hard enough, which could be a failure in due diligence.

The mean average score for 'Find it' slightly increased this year, reflecting a general improvement in transparency and corporate action. The data shows some encouraging trends in supply chain visibility, in recognising that migrant workers face heightened risk and in recognising the value of disclosure.

One of the most significant improvements relates to companies disclosing the numbers of workers in their supply chains and operations (question 25). For the first point, companies need to disclose both their number of employees and their number of workers in the first tier of their supply chain. This is one of the more stretching questions in the benchmark, so we were pleased to see that 35% of companies were awarded a point compared to 12% last year. The increased score reflects better visibility of supply chains, which is a positive trend.

We are pleased to see a significant increase in the number of companies recognising the risks faced by migrant workers. This year, 79% of companies (previously 57%) identified recruitment of migrants or temporary labour as a human rights risk (question 26). Additionally, 32% of companies (previously 20%) disclosed details of how migrants are recruited (question 27).

More comprehensive disclosures surrounding the recruitment of migrant workers indicate improvements in both policy and practice. This development is particularly welcome in light of the areas we flagged for improvement in last year's benchmark.

This section also saw a rise in the number of companies scoring two points for working with multi-stakeholder and industry initiatives to inform their risk assessments, increasing from 46% to 60% of companies (question 28). This indicates that more companies have disclosed working with human rights consultancies, industry initiatives, multi-stakeholder initiatives or NGOs. We are particularly encouraged by the fact that companies are dedicating more resources to the issue of modern slavery and are demonstrating an increased willingness to learn and collaborate.

This year, we tightened the requirement for companies to disclose why and how their most salient modern slavery risks could occur (question 29). Instead of asking them to name their salient risks, we are looking for companies to situate the risks within their own operations. Despite the criteria becoming slightly more specific, 40% of companies scored this point, an increase of 4 percentage points from last year. This indicates a genuine improvement in transparency. Similarly, 86% of companies provided the number of whistleblowing reports flagged for concern compared to 77% last year (question 35). These results indicate that companies are increasingly recognising the value of disclosure.

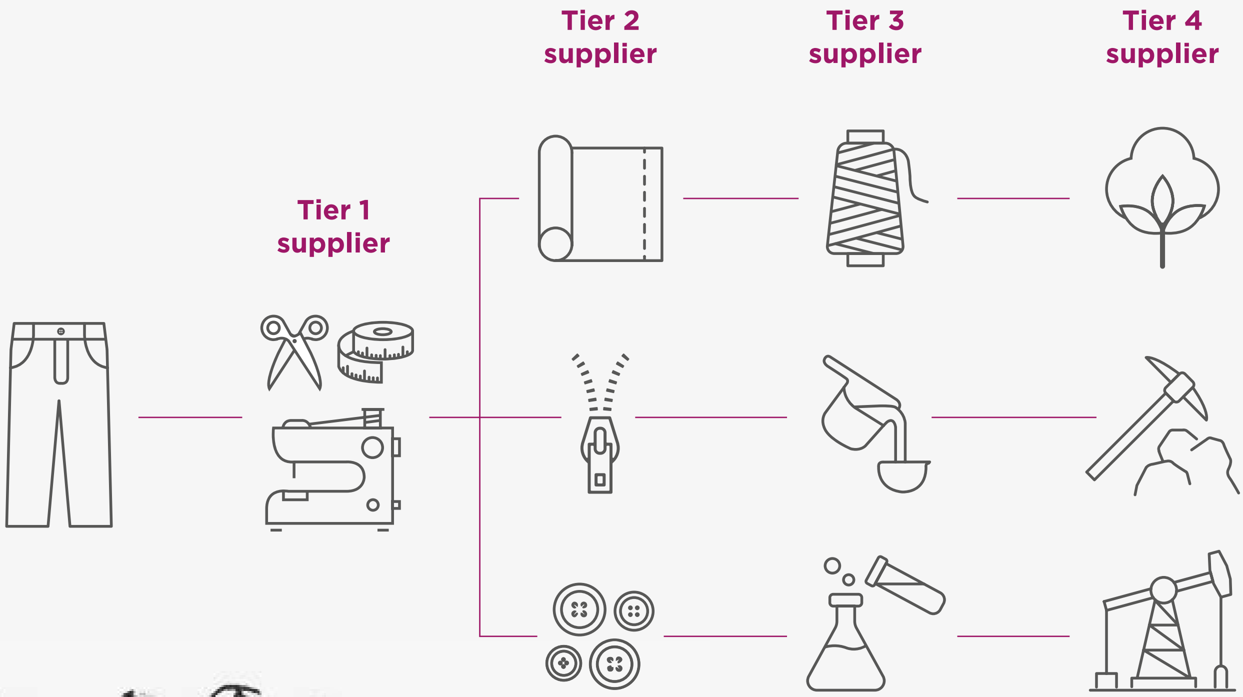
EXPLANATION
SUPPLY CHAIN TIERS

Different companies define supply chain tiers in different ways. For the purposes of this benchmark, we define tier one as consisting of the suppliers that have a direct relationship with the company, excluding buying agents. Suppliers in tiers two, three and four are sub-suppliers to tier one suppliers.

The classic example comes from the fashion supply chain. The tier one suppliers are ‘cut-make-trim’ factories, which manufacture garments; the tier two suppliers are dyehouses and fabric mills; the tier three suppliers are yarn spinners; and the tier four suppliers are cotton farmers.

Within this broad understanding and given the complexity of how supply chain tiers are defined across sectors, generally speaking we give leeway for companies to define their own tiers. However, it became clear in our engagement that some companies believe tiers should be defined based on the value of their spending – so, for example, tier one would be the top 10 suppliers by spend. For the purposes of supply chain mapping and disclosing supplier lists, this is not what this benchmark is looking for. In our analysis, we therefore ensured that supply chains were mapped according to function and not spending.

For examples of good practice, refer to Appendix 3.



Further evidence of the overall increase in transparency is seen in the fact that more companies disclosed finding modern slavery and/or indicators of modern slavery in their supply or value chains this year (question 36). In total, 35 companies (32%) scored the point available for this question – an increase of five since last year. It is also encouraging to see that, of those 35, 11 companies disclosed a case for the first time this year.

Companies must score on question 36 to score on questions 38–42 in the 'Fix it' section (see page 30).

GOOD PRACTICE CASE STUDY
SALIENT RISK

The UN Guiding Principles Reporting Framework defines salient human rights issues as 'the human rights at risk of the most severe negative impact through the company's activities and business relationships'.[43] Salient risks are distinct from material risks, which are risks to a company's financial performance, reputation or operations. Companies that disclose their salient risks demonstrate that their risk assessment centres on the impact of modern slavery on the people affected, rather than its business.

United Utilities Group both names its salient risks and explicitly provides context as to how and where these risks might occur. For example, it identifies allegations of debt bondage and movement restrictions as being commonly associated with personal protective equipment manufacturing in China and Malaysia.[44] ITV similarly discloses detailed examples of how modern slavery could manifest in its business model. For example, in workplace services, it identifies that roles in security, catering and cleaning are at higher risk of modern slavery due to cost-cutting pressure on low-paid roles.[45] In these examples, the company provides a contextualised disclosure by naming specific salient risks, explaining the mechanisms through which they arise, and linking them to particular product categories and geographies in its supply chain or business model.

For service-based sectors, disclosing salient risks can present more of a challenge. Lloyds Banking Group discloses how modern slavery and migrant labour risks could manifest in different parts of its business, investments and supply chain. For example, in its core supply base, Lloyds links risks in IT hardware and catering to conflict minerals and potential exploitation of temporary workers.[46] Intertek Group, also in the services sector, discloses that seasonal and migrant workers in higher-risk supplier countries are at increased risk of abuses such as the withholding of salaries and excessive working hours. The company explains that this is due to reduced access to legal protections.[47] These disclosures go beyond naming generic risks by explaining how and why these specific risks to people occur within the company's operations and where they arise.

For further examples of good practice, refer to Appendix 3.

GOOD PRACTICE CASE STUDY
FINDING MODERN SLAVERY

Having good sight of the supply chain is invaluable for monitoring human rights risks and breaches, and, crucially, companies that disclose when they have found cases demonstrate transparency and accountability. Disclosing cases acknowledges the systemic nature of forced labour and allows for proper remedy to be given to those affected.

There are many ways that companies in the CCLA Modern Slavery UK Benchmark 2025 have disclosed cases of modern slavery. In the financial sector, NatWest Group disclosed how its new Sexual Exploitation Dashboard, implemented to strengthen its approach to financial crimes, identifies indicators of a customer's involvement in human trafficking. The company has been able to escalate potential concerns to law enforcement and authorities.[48]

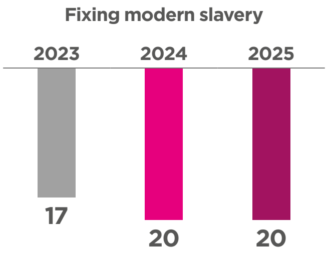
Similarly, Whitbread reported that 1.62% of the instances of non-compliance found via its audit programme for tier one and two suppliers were related to questions around whether workers were able to freely choose their employment.[49] Such transparency is crucial for removing the stigma around companies finding forced labour in their operations.

Finally, Haleon has disclosed systemic modern slavery associated with its mint supply chain in India. It acknowledges how child labour and forced labour are pervasive in these types of agricultural supply chain and has introduced the Healthy Mint Supply Chain Programme to tackle the root causes of child labour in its supplier base.[50]

Disclosing audit findings, identifying individual cases and acknowledging the systemic presence of modern slavery in a key sourcing sector are all best practice. These communications provide valuable insights for investors and other stakeholders.

For further examples of good practice, refer to Appendix 3.

Section 4: Fixing modern slavery



The 'Fix it' section of the CCLA Modern Slavery UK Benchmark focuses on the need to provide or enable remediation when human rights and modern slavery cases are identified.

CCLA believes that all assessed companies have the capacity to find modern slavery in their supply chains. Therefore, to score 88% of the available points in this section, companies must have disclosed finding a case of modern slavery.

This year's results are consistent with the previous year's, with companies scoring an average of 20% in this section. The nature of these questions requires companies to take and evidence more impactful actions. As a result, it is more challenging for companies to gain points in this section and it therefore remains the lowest scoring. An overarching theme within the 'Fix it' section is the balance between policy commitments and practical action in the form of remediation.

Since last year, seven more companies have committed to the UN Guiding Principles on Business and Human Rights in their modern slavery statement or human rights policy, enhancing the UNGPs' standing as an accepted and commonly referenced framework for businesses (question 37). Although this is a positive improvement in relation to policy commitments, only one company demonstrated how it had been linked to modern slavery (question 38).

There are initial signs of progress towards practical action. Of the 35 companies that disclosed cases of modern slavery, 80% disclosed the initial steps they had taken to provide remedy and mitigate future harm (question 39). For example, companies disclosed implementing new policies and monitoring processes, engaging with suppliers to ensure repayment of recruitment fees, and returning confiscated passports as forms of remedy. It is encouraging to see that this increased rate of disclosure has led to more companies scoring the one or two points available for this question.

EXPLANATION
COMPANIES LINKED TO MODERN SLAVERY CASES

Question 38

Where violations were found, in the words of the UN Guiding Principles, has the company disclosed whether it has caused, contributed to or been linked to an adverse human rights impact (modern slavery case)?

Question 38 was the lowest scoring in the framework. 'Caused', 'contributed to' and 'linked to' are different ways of describing the strength and nature of the relationship between a company and a human rights harm. If a case of modern slavery was found in a company's direct operations and was due to negligence of staff or employees, it would be categorised as 'caused'. However, it is much more likely – especially in the context of supply or value chains – for a case to be categorised as 'contributed to' or 'linked to'. If an issue is found in a tier one supplier, it might be that the company contributed to the issue. However, issues in further tiers of a supply chain might be categorised as 'linked to'.

The UN Guiding Principles on Business and Human Rights (UNGPs) suggest that the stronger the link between a company and an adverse human rights impact, the greater the responsibility for giving remedy. Given the emphasis the UNGPs place on determining the nature of the link, it is disappointing that so few companies have been awarded this point.

For an example of good practice relating to question 38, refer to Appendix 3.

Despite these clear improvements, fewer companies reported remedial outcomes for those affected by forced labour (question 40). In 2024, 18% of companies reported outcomes for victims, but this year only 14% did. This can be explained by a growing shift in corporate reporting away from disclosing individual remedies for victims towards more systemic reporting.

This transition is reflected in the increase in reporting on how companies have worked collaboratively to provide remedy at a systemic level (question 42). There has been an increase of four companies achieving one point and an increase of two companies achieving full points, despite fewer companies providing evidence of satisfactory remedies to victims (question 41). This trend illustrates a promising progress towards maturity in the reporting of systemic remedy, suggesting that the actions companies are undertaking are having an effect on a greater scale – beyond individual cases.

EXPLANATION
REMEDY TO VICTIMS

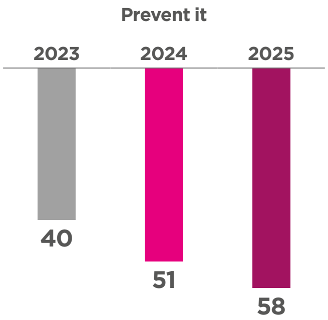
Question 41

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

Question 41 is based on a clear expectation in the UN Guiding Principles on Business and Human Rights (UNGPs), which outline expectations for businesses and state actors on providing access to remediation.

The UNGPs stress that 'for an operational-level grievance mechanism, engaging with affected stakeholder groups about its design and performance can help to ensure that it meets their needs, that they will use it in practice, and that there is a shared interest in ensuring its success. Since a business enterprise cannot, with legitimacy, both be the subject of complaints and unilaterally determine their outcome, these mechanisms should focus on reaching agreed solutions through dialogue. Where adjudication is needed, this should be provided by a legitimate, independent third-party mechanism.'[51]

For examples of good practice on question 41, refer to Appendix 3.



Section 5: Preventing modern slavery

Companies can take a variety of preventative actions without having identified cases of modern slavery, and 'Prevent it' has demonstrated the most consistent year-on-year improvement since 2023.

This section focuses on the leadership and resources needed to tackle modern slavery, ensuring the company has responsible procurement practices, and endorsement of key policy stances such as the Employer Pays Principle.

It is crucial for companies to have a clear governance structure around addressing modern slavery. One of the highest-scoring questions this year concerns board-level oversight of a company's modern slavery approach (question 47). However, there has always been a gap between the number of companies scoring on question 47 and the number of companies that disclose who is responsible for implementing human rights policies (question 48). This reflects the general imbalance between policy and action seen throughout the benchmark. It is therefore encouraging to see an increase of 20 companies disclosing which committee, team, programme or officer is responsible for their modern slavery strategy. In total, 89% of companies scored the point available for this question. We hope this trend will continue into 2026.

Treatment of suppliers is another way that companies can help to prevent modern slavery. The benchmark looks for three things to evidence a company's responsible approach to purchasing practices: a policy commitment, evidence of responsible purchasing practices and a mechanism for suppliers to give anonymous feedback on the company's procurement (question 46). As ever, companies performed well for the policy commitment, with 85 scoring. Furthermore, encouragingly, 76 companies gave evidence of their responsible purchasing practices – 23 more than last year. This was one of the most improved questions in this section. This might be due to a growing awareness of the importance of responsible purchasing practices, as well as increased scrutiny by investors.

EXPLANATION
RESPONSIBLE EXIT

Question 44
Did the company discuss a responsible exit strategy from a supplier relationship?

This question remains a low-scorer in this year's benchmark. Companies have a variety of options when a case of modern slavery or a broader adverse human rights impact is found within a supplier. Option one is to exit at the first opportunity, but this is likely to be detrimental to vulnerable workers. Therefore, companies will often try to remediate the situation by working in collaboration with the supplier, only choosing to sever the relationship if the supplier is unresponsive or tries to obstruct the process. We believe this option is best.

To score the point available for this question, companies must recognise that working to remedy a situation is in the best of interests of individuals, rather than simply easier from a business continuity perspective. They must show how they would leave in a way that would minimise harm to the affected workforce.

Relevant guidance can be found in a number of multi-stakeholder organisations (including the Ethical Trading Initiative). The guidance reflects on the important role that enhanced human rights, due diligence, stable trading relationships and responsible purchasing practices can play during a period of uncertainty when adverse human rights impacts are likely to occur.

For examples of good practice on question 44, refer to Appendix 3.

Sector analysis

The 111 companies in this benchmark represent 11 industry sectors, which are classified using the Global Industry Classification Standard (GICS) as communication services, consumer discretionary, consumer staples, energy, financials, health care, industrials, information technology, materials, real estate and utilities.

Key trends

1 There is growing deviation in the performance of the two top-scoring sectors

Consumer staples and consumer discretionary were the highest-performing sectors. In the previous two years, these sectors were among the highest-performing sectors, alongside utilities. This is unsurprising given their exposure to risks, the number and frequency of media exposés over the years, and the maturity of their labour rights programmes.

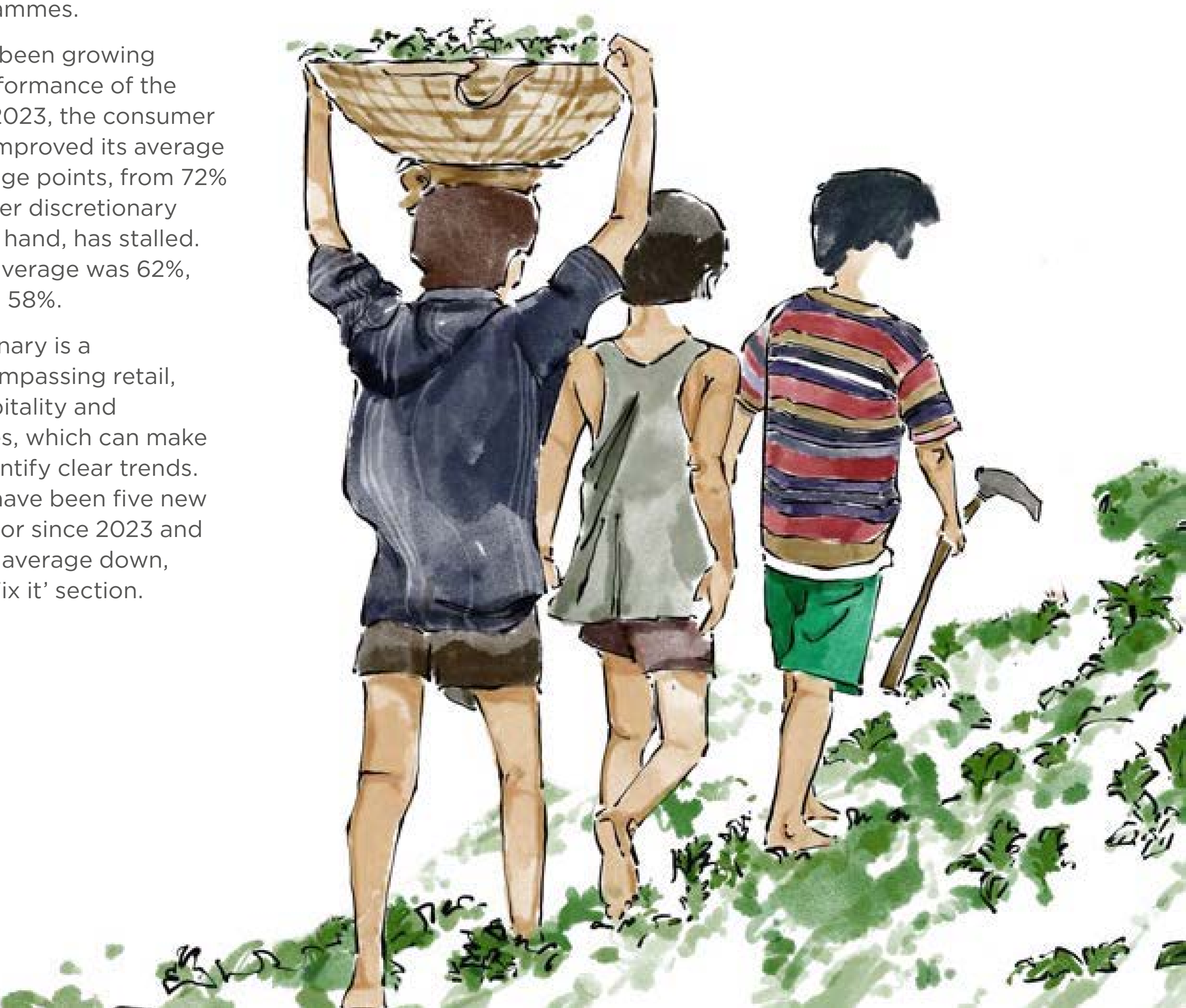
However, there has been growing deviation in the performance of the two sectors. Since 2023, the consumer staples sector has improved its average score by 9 percentage points, from 72% to 81%. The consumer discretionary sector, on the other hand, has stalled. In 2023 the sector average was 62%, but it now stands at 58%.

Consumer discretionary is a diverse sector encompassing retail, housebuilding, hospitality and gambling companies, which can make it challenging to identify clear trends. Additionally, there have been five new entrants to this sector since 2023 and they have pulled its average down, particularly in the 'Fix it' section.

2 Information technology replaced real estate as the worst-performing sector in 2025

Following significant improvements in the real estate sector, information technology now has the lowest average score, at 47%. This places the sector as a whole into performance tier 3 ('meeting basic expectations').

This is not surprising: information technology companies are service based, and they are significantly distanced from where the greatest risk of forced labour resides. Forced labour is not their most salient risk. Information technology has, however, seen an improvement since 2023 of seven percentage points. In particular, these companies have recognised their modern slavery risks in their facilities management contracts.



3 Industrials has seen the most improvement in disclosing cases of modern slavery

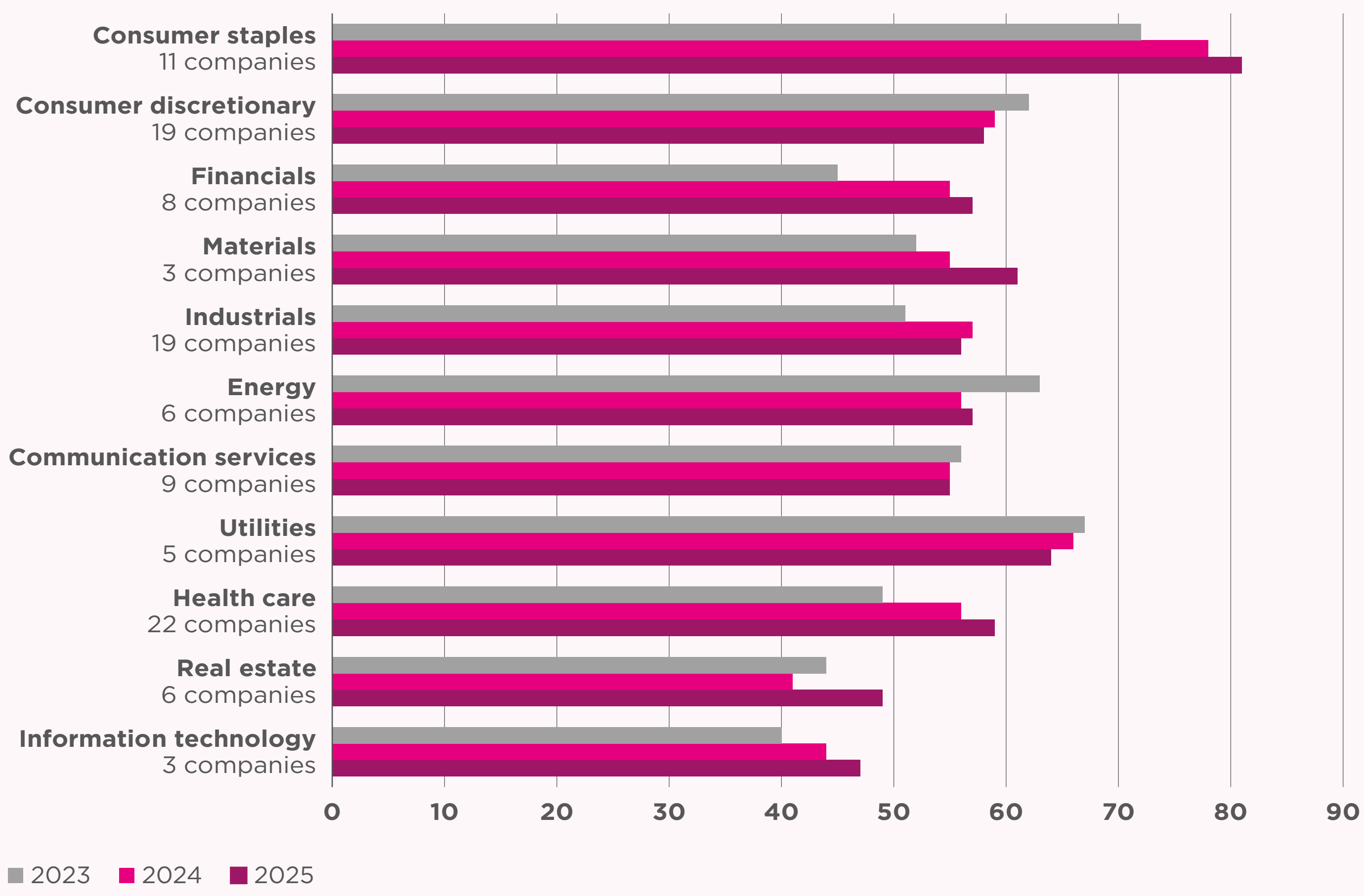
Given the importance placed on finding modern slavery in the benchmark, we are pleased to see the improvements made in the industrials sector. Six industrials companies disclosed finding modern slavery, compared to just two in 2023. Two companies discovered forced labour issues following audits conducted at suppliers beyond tier one. Cascading audits and monitoring beyond immediate suppliers are best practice considering that forced labour risks are higher in lower supply chain tiers.

4 The most improved sectors since 2023 are financials and health care

The financials and health care sectors have seen the most improvement since 2023. These improvements have been concentrated in the 'Find it' and 'Prevent it' sections, in keeping with the general pattern of improvement in the benchmark. It should, however, be noted that the financials sector has improved by 7 percentage points in 'Fix it', and five financials companies disclosed cases of forced labour this year. The improvement is partially due to the inclusion of value chain activities in the scope of the 2024 and 2025 benchmarks.

The chart below shows the 11 sectors and their average percentage scores over the three years of the benchmark.

SECTOR PERCENTAGE SCORES 2023–2025



REAL ESTATE

The real estate sector covers listed companies involved in real estate development, operation and related services, including equity real estate investment trusts (REITs). There are six real estate companies in the benchmark: British Land, Land Securities Group, LondonMetric Property, SEGRO, Tritax Big Box REIT and Unite Group.

All six companies in the real estate sector improved their disclosures in their 2024 statements and this was the most improved sector, with the average score increasing by 8 percentage points, to 49%. Indeed, Tritax Big Box REIT was among the biggest improvers, increasing its score between 2024 and 2025 by 13 percentage points.

Last year the real estate sector was the poorest-performing sector in the benchmark, with an average score of 41%. This is concerning because these companies are involved in the development of land and are therefore in the value chain of the construction industry, which is a known high-risk sector for forced labour. The construction sector's modern slavery risks are related to significant use of relatively unskilled labourers (many of whom are migrants from overseas), endemic subcontracting, and project leads having limited oversight of which contractors are on-site at any given time. In addition, construction and land development use materials such as bricks, concrete, glass, stone and timber, some of which is sourced from countries with weak labour laws and poor labour market enforcement. As the ultimate customer of the construction value chain, real estate companies can play a role in setting the standards for the construction industry and ensure that responsible decisions are made and cascaded down the chain.

Last year we noted that it was in the 'Find it', 'Fix it' and 'Prevent it' sections of the framework that real estate companies particularly struggled to score well. This year, while the 'Fix it' section remained low, with an average score of 6%, it is good to see that the average score for 'Find it' increased by 11 percentage points and 'Prevent it' increased by 19 percentage points. This suggests that improvements in disclosure have translated into tangible actions and procedures to find and prevent modern slavery.

GOOD PRACTICE CASE STUDY
TRITAX BIG BOX REIT

"We're delighted to have made significant progress in this year's CCLA benchmark and to contribute to the strong performance of the real estate sector. Enhancing our approach to modern slavery risk management, we're engaging with external parties to improve our processes; expanding our supplier due diligence and monitoring; and embedding modern slavery clauses into building and service contracts. We've also rolled out modern slavery training. We appreciate that it's never 'job done', and through our manager, Tritax Management LLP, we continually review and improve how modern slavery is assessed and disclosed within our operations and supply chain – and are committed to driving positive change across our sector."

Vanya Sturm
ESG Analyst, Tritax Big Box REIT

Emerging themes

1 Companies have continued to improve their disclosures despite uncertainty in the regulatory landscape

The improvement trend established last year has continued, with 60 companies increasing their score and 25 companies moving up a tier in the benchmark compared with 2024. The average score has increased by 5.6 percentage points between 2023 and 2025. This is good to see given the mixed signals on human rights reporting in Europe and the changing geopolitical context.

Furthermore, the improvements have not just been in the compliance and conformance sections of the benchmark but also in the 'Find it' and 'Prevent it' sections. This suggests that companies' disclosures are matched by actions.

Last year, we noted that anticipation of the Corporate Sustainability Due Diligence Directive (CSDDD)[52] and Corporate Sustainability Reporting Directive (CSRD)[53] in the European Union, alongside benchmarking and investor engagement, had played a role in driving better disclosure. Given that the Omnibus Package has signalled a significant simplification and easing of requirements,[54] it is positive to see increased transparency in this area.

The UK government has continued to push for increased reporting on modern slavery and, from our discussions with the Home Office and other parties associated with the government, we believe this trend will continue. Modern slavery and forced labour risks are material and salient for many businesses. Investors expect companies to be managing these risks responsibly. Technology such as machine learning, blockchain and cloud-based tracking systems have made mapping supply chains and conducting due diligence easier. These developments will help to perpetuate improvements in transparency despite the uncertainty in the regulatory landscape.

2 More companies are reporting 'finding' modern slavery

The number of companies reporting finding modern slavery or its indicators (question 36) has once again increased this year. In total 35 companies disclosed a case of modern slavery in their operations or supply chains, including 11 that had not done so in 2024 or 2023. While many of these companies are in the consumer discretionary or consumer staples sectors, most of the companies reporting cases for the first time are from the financials, health care, industrials and utilities sectors.

As observed in last year's benchmark report, we understand that disclosing cases might be difficult for the business community, which is wary of highlighting bad news to the public and the market. Nevertheless, disclosing cases is the first step in remedying and addressing an issue, and a key performance indicator for understanding whether due diligence processes are working. This is the philosophy behind the Find it, Fix it, Prevent it investor coalition, and is in line with the UN Guiding Principles on Business and Human Rights and the CSDDD.

It may seem perverse on first inspection to see companies disclosing cases as a positive. However, given that there are an estimated 50 million people around the world trapped in modern slavery,[55] disclosing cases shows that company due diligence systems are reflective of the world as it is, not how we would like it to be.

3 Legislation is still needed to level the playing field

There continues to be a large gap between the highest-scoring company and the lowest-scoring company. While the materiality and salience of modern slavery risks vary across sectors, this does not explain the discrepancy between the highest- and lowest-scoring companies. The introduction of new statutory guidance in March 2025 is welcome, but legislation is still required both to strengthen the disclosure requirements of the Modern Slavery Act and to mandate human rights due diligence so that there is consistency and a level playing field.

4 All six companies in real estate have improved

Last year, real estate was the lowest-scoring sector in the benchmark, despite its exposure to the high-risk construction industry. This is why we chose to focus a deep dive on the sector last year.[56] We are glad to be able to spotlight the real estate sector again this year (see page 35) for improving its scores across the benchmark. In particular, we are pleased to see companies improving their disclosures on 'Find it' and 'Prevent it', because this suggests that the sector is stepping up and using its influence in its construction value chain.

It may seem unusual

to regard companies' disclosure of cases as a positive, yet doing so indicates that their due diligence systems reflect the world as it is, not how we would like it to be

Recommendations and looking ahead

Recommendations

Based on the analysis of the benchmark and the themes that emerged, we make various recommendations for companies, investors and policymakers.

Companies

- Become familiar with the new requirements in the Home Office guidance on transparency in supply chains[57] and conduct a gap analysis at least against the new Level 1 requirements, which have been strengthened.
- Ensure there is strong internal governance on modern slavery – including responsibility at board level and appropriate committees or structures – and be sure to include workers' and relevant stakeholders' perspectives.
- Conduct and disclose detailed operational and supply chain risk assessments. These should include forced labour risks across supply chain locations (beyond tier one) and, importantly, direct operations. Risk assessments should go beyond desk-based assessments to include engagement with people at risk of modern slavery.
- Disclose and provide details of suspected cases of modern slavery, the steps that have been taken to provide remedy for victims, and the outcomes of this process.
- Adopt and disclose responsible procurement practices that enable suppliers to uphold the standards that are in the company's supplier code of conduct and in line with international best practices.

Investors

- Use the CCLA Modern Slavery UK Benchmark 2025 framework in engagement with portfolio companies to identify areas where a company is not performing well and where it can take additional steps.
- In line with CCLA's own practices, consider voting against the financial statements and annual reports of those companies that are in performance tiers 4 or 5 and that do not respond positively to engagement.
- Consider joining collaborative investor engagement programmes such as Find it, Fix it, Prevent it and Rathbones' Votes Against Slavery campaign.[58]

Policymakers

- Fulfil existing government commitments[59] to extend modern slavery reporting to the public sector and to introduce mandatory topics for disclosure, an annual reporting deadline and fines for non-compliance.
- Mandate companies to upload their modern slavery statements to the government's Modern Slavery Statement Registry.[60]
- Ensure that legislation on modern slavery disclosures mandates financial institutions to report on their investing and lending portfolios.
- Introduce mandatory human rights due diligence legislation and align the UK's human rights expectations with international obligations on human rights.

Companies, investors and policymakers

- Closely monitor developments in legislation on corporate sustainability due diligence in the European Union and import bans both there and in the United States.

Looking ahead

CCLA is committed to working to address the scourge of modern slavery, supporting companies in addressing modern slavery risks, and coordinating and developing the Find it, Fix it, Prevent it collaborative investor initiative on modern slavery.

We have developed this benchmark to better understand companies' performance on modern slavery. While we have used it to assess performance and disclosures, the framework also offers a clear way for companies to structure their management processes and their disclosures on modern slavery. Importantly, it provides investors with a tool to help them consider modern slavery when they are forming views on companies, and to guide their active engagement.

As already noted, in April the Home Office published new guidance titled 'Transparency in Supply Chains' (TISC). We were pleased to contribute to the Home Office Forced Labour Forum and to see the Home Office use some of the metrics in the CCLA Modern Slavery UK Benchmark framework in the updated TISC guidance. However, these developments mean that the framework needs to be updated to remain aligned with the statutory guidance. CCLA has undertaken a gap analysis against the new TISC guidance and has used the opportunity to consider evolving expectations on business in relation to modern slavery and business and human rights. Next year's benchmark will be undertaken using an updated framework. We will publish the updated framework in January 2026, so most companies will have time to consider the new requirements before publishing their 2026 statements.

Disclosure of suspected cases

of modern slavery should be encouraged along with the steps to provide remedy for victims and the outcomes of the process

Appendix 1:
Methodology

Process

The 111 companies in the CCLA Modern Slavery UK Benchmark 2025 were assessed between 21 July and 15 August 2025.

We worked with environmental, social and governance (ESG) data consultancy Canbury to train a large language model (LLM) to support the assessment of company disclosures.

In this way, we adopted a hybrid approach to the company assessments. Relevant company disclosures were gathered manually on 16 July 2025 and were put through the LLM, which created a scorecard for each company. An extensive human-led quality assurance process was then employed, which involved human assessors checking each data point to ensure accuracy and confidence in the outputs.

This hybrid process 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.

Between 18 August and 5 September 2025, companies were invited to review and comment on their preliminary assessments. Companies received their assessment reports individually and could send feedback via a survey link or provide written comments over email. In total, 65 companies provided feedback in this review period, and this was evaluated by the CCLA team. After additional quality checks, the scores were finalised. As a last step, each company received its updated assessment report before the benchmark's publication in November.

Accepted sources of evidence for the benchmark assessments

The assessments involved a review of the material available on 16 July 2025 on companies' corporate websites. The primary document used in the assessments was 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, were only assessed for question 2.

Given that the first two sections of the framework are based on the UK Modern Slavery Act 2015 and corresponding Home Office guidance, the only disclosure document scored for these two sections was a company's UK modern slavery statement. Where a group statement did not exist, we assessed each subsidiary in scope of the Modern Slavery Act. In these cases, for the parent company to be awarded points, each underlying subsidiary had to comply. Statements pursuant to modern slavery legislation outside the UK were not assessed.

Recognising the reporting burden that many businesses are under, any document that was directly hyperlinked within a company's modern slavery statement was considered an extension of the statement and scored in the second section ('Conformance with Home Office guidance').

The ‘Find it’, ‘Fix it’ and ‘Prevent it’ sections of the benchmark assessed any 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 made up more than 40% of a group’s total business revenue, its disclosures were considered to be in scope for the ‘Find it’, ‘Fix it’ and ‘Prevent it’ sections. In these cases, the subsidiary disclosures were scored alongside the group. The only company affected in the 2025 benchmark was Associated British Foods. Primark’s 2024 modern slavery statement[61] and global sourcing map[62] were assessed alongside Associated British Foods’ other disclosures.

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

Appendix 2:
Companies assessed

The companies in the benchmark were selected in March 2025 based on their market capitalisation, previous inclusion in the benchmark and whether they are in the scope of the Modern Slavery Act 2015. All are UK-listed.

Some investment trusts were removed from the top 100 companies as they do not fall under the scope of the Modern Slavery Act.

This year, we assessed 111 companies (compared to 110 in 2024). Five companies were removed – Darktrace, Dechra Pharmaceuticals, DS Smith, Hargreaves Lansdown and Smurfit Kappa Group – due to corporate actions or changes to location of listing. We added six new companies: Babcock International Group, Games Workshop, Harbour Energy, IG Group, ITV and Softcat. Companies that have dropped out of the top 100 by market capitalisation are retained in the benchmark for two additional years to assess their ongoing progress.

Name	GICS sector	Modern slavery statement assessed
3i Group	Financials	3i Group plc slavery and human trafficking statement for the financial year ended 31 March 2024 (‘FY24’)
Aberdeen Group	Financials	Aberdeen Group plc modern slavery statement 2024
Admiral Group	Financials	Admiral Group modern slavery statement 2024
Airtel Africa	Communication services	Airtel Africa PLC modern slavery policy statement financial year ended 31 March 2024
Anglo American	Materials	Modern slavery statement 2024 Anglo American
Antofagasta	Materials	Modern slavery statement Antofagasta plc 2024
Ashtead Group	Industrials	Ashtead Group modern slavery statement for year ended April 2024
Associated British Foods	Consumer staples	Associated British Foods plc modern slavery statement 2024
AstraZeneca	Health care	AstraZeneca Modern Slavery Act statement for the year ending 31 December 2024
Auto Trader Group	Communication services	Auto Trader Group plc statement on Modern Slavery Act for financial year ended 31 March 2024
Aviva	Financials	Aviva’s modern slavery and human trafficking statement 2024
B&M European Value Retail[i]	Consumer discretionary	B&M modern slavery statement 2024
Babcock International Group*	Industrials	Babcock International modern slavery transparency statement 2025
BAE Systems	Industrials	BAE Systems UK Modern Slavery Act – statement 2025
Barclays	Financials	Barclays plc group statement on modern slavery February 2025
Barratt Redrow	Consumer discretionary	Barratt Developments plc modern slavery and human trafficking statement for financial year ending 30 June
Beazley	Financials	Beazley Modern Slavery Act statement 2025
Berkeley Group Holdings	Consumer discretionary	Berkeley Group 2023/24 modern slavery statement
BP	Energy	BP UK modern slavery and human trafficking statement 2024
British American Tobacco	Consumer staples	BAT modern slavery statement 2024
British Land	Real estate	British Land Company Plc (‘British Land’) slavery and human trafficking statement 2024
BT Group	Communication services	BT Group modern slavery statement 2024/25
Bunzl	Industrials	Bunzl modern slavery and human trafficking statement 2024
Burberry Group	Consumer discretionary	Burberry transparency in the supply chain and modern slavery statements 2024/25
Carnival	Consumer discretionary	Carnival modern slavery statement 2023
Centrica	Utilities	Centrica our modern slavery statement 2024
Coca-Cola HBC	Consumer staples	Coca-Cola HBC Northern Ireland 2024 slavery and human trafficking statement
Compass Group	Consumer discretionary	Compass Group Modern Slavery Act statement for financial year ending 30 September 2024
Convatec Group	Health care	Modern Slavery Act Convatec Group plc May 2025

Name	GICS sector	Modern slavery statement assessed
CRH	Materials	Modern slavery statement of CRH plc for the year ended December 31, 2024
Croda International	Materials	Croda modern slavery statement 2025
DCC	Industrials	DCC plc slavery and human trafficking statement for the year ended 31 March 2025
Diageo	Consumer staples	Diageo Modern Slavery Act statement for the financial year ended 30 June 2024
Diploma	Industrials	Diploma plc transparency statement 2024
easyJet	Industrials	easyJet Modern Slavery Act transparency statement for financial year ending 30 September 2024
Endeavour Mining	Materials	Endeavour Mining modern slavery statement 2024
Entain	Consumer discretionary	Entain modern slavery and human trafficking transparency statement for financial year 2024
Experian	Industrials	Experian plc – modern slavery statement for financial year ending 31 March 2025
Flutter Entertainment	Consumer discretionary	Flutter Entertainment plc modern slavery statement 2024
Frasers Group	Consumer discretionary	Frasers Group modern slavery and human trafficking transparency statement 2025
Fresnillo	Materials	Fresnillo plc modern slavery statement for financial year ending 31 December 2024
Games Workshop*	Consumer discretionary	Games Workshop Modern Slavery Act statement for financial year ending 2 June 2024
Glencore	Materials	Glencore 2024 modern slavery statement
GSK	Health care	GSK Modern Slavery Act statement 2024
Haleon	Health care[ii]	Haleon human rights statement 2024: covering modern slavery, decent work, forced labour and child labour
Halma	Information technology	Modern Slavery Act statement 2025 Halma plc
Harbour Energy*	Energy	Harbour Energy modern slavery and human trafficking statement for financial year ending 31 December 2024
Hikma Pharmaceuticals	Health care	Hikma modern slavery statement 2024
Hiscox[i]	Financials	Hiscox modern slavery statement for the year ended 31 December 2023
Howden Joinery Group	Industrials	Howdens' statement by the board of directors on human rights and modern slavery 2024
HSBC Holdings	Financials	HSBC modern slavery and human trafficking statement 2024
ICG	Financials	ICG Group statement on modern slavery for financial year ending 31 March 2024
IG Group*	Financials	IG Group Holdings plc statement on slavery and human trafficking for financial year ending 31 May 2024
IMI	Industrials	Modern slavery and human trafficking statement IMI plc financial year ending 31 December 2024
Imperial Brands	Consumer staples	Imperial Brands modern slavery and human trafficking statement 2024
Informa	Communication services	Informa 2024 Modern Slavery Act statement
InterContinental Hotels Group	Consumer discretionary	IHG Hotels & Resorts modern slavery statement 2024
International Consolidated Airlines Group	Industrials	International Airlines Group modern slavery statement for financial year ending December 2024
Intertek Group	Industrials	Intertek modern slavery statement 2024
Investec	Financials	Investec Modern Slavery Act statement 2025
ITV*	Communication services	ITV Modern Slavery Act March 2025 transparency statement
J Sainsbury	Consumer staples	J Sainsbury plc 2024/25 modern slavery statement
JD Sports Fashion	Consumer discretionary	JD Group modern slavery statement 2024/25
Kingfisher	Consumer discretionary	Kingfisher Modern Slavery Act transparency statement 2024/25
Land Securities Group	Real estate	Landsec modern slavery statement 2025
Legal & General Group	Financials	Legal & General Group plc modern slavery statement 2024
Lloyds Banking Group	Financials	Lloyds Banking Group modern slavery statement 2024
London Stock Exchange Group	Financials	LSEG Modern Slavery Act statement 2024
LondonMetric Property	Real estate	LondonMetric Property plc modern slavery statement for the year to 31 March 2024
M&G	Financials	M&G plc modern slavery transparency statement 2024

Name	GICS sector	Modern slavery statement assessed
Marks & Spencer Group	Consumer staples	M&S modern slavery statement 2025
Melrose Industries	Industrials	Melrose 2024 modern slavery statement
Mondi	Materials	Mondi Group human trafficking and modern slavery statement 2024
National Grid	Utilities	National Grid 2025 modern slavery statement
NatWest Group	Financials	NatWest Group plc 2024 statement of modern slavery and human trafficking
NEXT	Consumer discretionary	NEXT modern slavery transparency statement 2024–25
Ocado Group	Consumer staples	Ocado Group modern slavery statement 2024
Pearson	Consumer discretionary	Pearson modern slavery statement June 2025
Persimmon	Consumer discretionary	Persimmon Group modern slavery transparency statement for financial year ending 31 December 2024
Phoenix Group Holdings	Financials	Phoenix modern slavery statement 2025
Prudential	Financials	Prudential modern slavery transparency statement 2024
Reckitt Benckiser Group	Consumer staples	Reckitt modern slavery and human trafficking statement 2024
RELX	Industrials	RELX Modern Slavery Act statement for financial year ending 31 December 2024
Rentokil Initial	Industrials	Rentokil Initial modern slavery statement 2024
Rightmove	Communication services	Rightmove PLC Modern Slavery Act transparency statement for financial year ending 31 December 2024
Rio Tinto	Materials	Rio Tinto modern slavery statement 2024
Rolls-Royce Holdings	Industrials	Rolls-Royce modern slavery statement 2024
Sage Group	Information technology	Sage Group anti-slavery and human trafficking statement FY24
Schroders	Financials	Schroders modern slavery statement 2024
SEGRO	Real estate	SEGRO modern slavery and human trafficking statement for financial year ending 31 December 2024
Severn Trent	Utilities	Severn Trent 2024 anti-slavery and human trafficking statement
Shell	Energy	Shell plc statement under the Modern Slavery Act for financial year ending December 31, 2024
Smith & Nephew	Health care	Smith & Nephew Modern Slavery Act statement for the year ended 31 December 2024
Smiths Group	Industrials	Smiths modern slavery statement for financial year ending 31 July 2024
Softcat*	Information technology	Softcat plc modern slavery statement for financial year ending 31 January 2025
Spirax Group	Industrials	Spirax Group plc modern slavery statement May 2025
SSE	Utilities	SSE human rights report and modern slavery statement 2024
St James's Place	Financials	St James's Place modern slavery and human trafficking statement 2024
Standard Chartered	Financials	Standard Chartered modern slavery statement 2024
Taylor Wimpey	Consumer discretionary	Taylor Wimpey plc and Taylor Wimpey UK Limited slavery and human trafficking statement – Modern Slavery Act 2015
Tesco	Consumer staples	Tesco modern slavery statement 2024/25
Tritax Big Box REIT	Real estate	Tritax Big Box our slavery and human trafficking statement 2025
Unilever	Consumer staples	Unilever modern slavery statement March 2025
Unite Group	Real estate	Unite Students our modern slavery statement for the year ended 31 December 2024
United Utilities Group	Utilities	United Utilities anti-slavery and human trafficking statement 2025
Vistry Group	Consumer discretionary	Vistry Modern Slavery Act transparency statement – 2024
Vodafone Group	Communication services	Vodafone Group plc modern slavery statement 2024/25
Weir Group	Industrials	Weir Group plc modern slavery statement for financial year ending 31 December 2024
Whitbread	Consumer discretionary	Whitbread plc modern slavery statement 2024/25
Wise	Financials	Modern slavery & human trafficking statement for the Wise Group 2024
WPP	Communication services	WPP modern slavery statement 2024

* Companies new to the benchmark
[i] Public disclosures were collected on 16 July 2025; B&M European Value Retail and Hiscox had not published a new modern slavery statement and were therefore assessed on the same statement as last year
[ii] Sector was changed from consumer staples to health care in January 2025
Data sources: Sustainalytics, 31 March 2025, and corporate websites
GICS = Global Industry Classification Standard

Appendix 3: Scoring framework and good practice case studies

This section sets out the 48 questions in the CCLA Modern Slavery UK Benchmark 2025.

It also provides examples of good and leading practice on modern slavery for many of the questions. Good practice is evident across all sectors and across the top three performance tiers. Unless otherwise indicated, case studies for multi-point questions are examples where companies have scored full points.

See the end of this appendix for a key to the standards mentioned.

Modern Slavery Act compliance and registry

For this section, only modern slavery statements are considered.

Question 1

Did the company include a prominent link to the slavery and human trafficking statement on its 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.

Scoring

Score	Description
0	There is no direct, clearly labelled link to a modern slavery statement on the website homepage.
1	There is a direct, clearly labelled link to a modern slavery statement on the website homepage.

Explanatory notes

- The link must be visible and clearly labelled on a company's homepage (either group or UK site).
- Links to corporate reporting webpages or general sustainability pages are not sufficient.

Question 2

Had the modern slavery statement been uploaded to the Modern Slavery Statement Registry?

Corresponding standards

None

Rationale

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

Scoring

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

Explanatory notes

- All public disclosures were collected on 16 July 2025, so statements needed to be on the registry on this date to score.

Question 3

Was the statement signed by a director (corporations), a designated member (LLPs) or a partner (partnerships)?

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

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

Explanatory notes

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

Question 4

Was the statement approved by the board of directors or an equivalent management body (except for LLPs)?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

This is a statutory requirement of the Modern Slavery Act.

Scoring

0	The statement has not been approved by the board of directors.
1	The statement has been approved by the board of directors.

Question 5

Did the company provide an explanation of the steps that it had or had not taken to ensure slavery and human trafficking was not taking place in any part of its business and supply/service 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.
1	There is an explanation of the steps taken to address modern slavery.

Explanatory notes

- The regulatory requirement is simple: this point is awarded for any discussion, no matter how brief, of the steps a company has taken to address modern slavery in its business or supply/service chain.

Question 6

Did 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.
1	There is a modern slavery statement that covers the most recent fiscal year.

Explanatory notes

- Public disclosures were collected on 16 July 2025.
- Modern slavery statements were considered to be covering the most recent fiscal year if they had been published in the past 15 months.

Conformance with Home Office guidance on modern slavery

For this section, modern slavery statements are considered alongside any other documents hyperlinked within them.

Throughout this section, 'business' refers to direct operations rather than the supply/service chain (labour, materials and services) or downstream value chain (customers, clients and investments).

Question 7

To what extent did the company provide information about its structure?

Corresponding standards

Home Office guidance 2021

Rationale

'Structure' refers to the legal structure of the company – for example, which parts of the business are covered by its modern slavery statement and whether subsidiaries are included. This is critical contextual information in assessing how a company sets out its approach to modern slavery.

Scoring

0	There is no detail given on how the company is structured.
1	There is a high-level summary of corporate structure, including some of the subsidiaries or brands covered by the modern slavery statement.
2	There is detailed discussion of corporate structure and it is immediately clear which subsidiaries are covered by the modern slavery statement.

Question 8

To what extent did the company provide information about its business?

Corresponding standards

Home Office guidance 2021

Rationale

Companies must have good oversight of their business to successfully identify modern slavery risks. Equally, a business's core activities, operational model and geographical footprint are important contextual information in assessing their modern slavery approach.

Scoring

0 There is no mention of what the business does and where it operates.

1 There is a high-level summary of core business activities and/or business operating locations.

2 There is detailed discussion of the nature and location of the business activities, as well as the working environment of employees and other associated parties.

2

Berkeley Group Holdings

Consumer discretionary

Berkeley is made up of six autonomous brands: Berkeley Homes; St George; St James; St Joseph; St William and St Edward which is a joint venture with M&G Investments. Berkeley operates through these autonomous divisions and operating companies, each with its own board of directors.

Berkeley is engaged in residential-led, mixed use property development in London, Birmingham and the South-East of England. We aim to transform the most challenging and complex brownfield sites into welcoming and sustainable places to live and work.

The average monthly number of persons employed by Berkeley during 2023/24 was 2,717 and an average of 8,821 contractor staff worked across Berkeley's 52 live construction sites each month. In 2023/24 Berkeley delivered 3,927 homes.

Berkeley also has eight overseas sales and marketing offices in Bangkok, Beijing, Chengdu, Dubai, Hong Kong, Shanghai, Shenzhen and Singapore. These overseas offices are not involved in any aspect of construction or development but focus primarily on customer liaison. The total number of employees based overseas in the year was 52. All Berkeley construction operations are UK based.

Berkeley Group, '2023/24 modern slavery statement'[63]

Question 9

To what extent did the company provide information about its **supply/service chains**?

Corresponding standards

Home Office guidance 2021

Rationale

Demonstrating a good understanding of the supply/service chain is critical. Modern slavery can occur at any point along the supply/service chain and therefore companies need to have good oversight of their suppliers to successfully identify modern slavery risks.

Scoring

0 There is no or limited information on the geographical distribution of the supply/service chain or the products or services acquired.

1 There is minimal information about the main supplier and/or service providers' locations and the products or services sourced.

2 There is detailed information about the supply/service chain, including the number of suppliers engaged, the countries suppliers operate in, and the products, commodities or services sourced.

2 £

Phoenix Group Holdings

Financials

At Phoenix Group we operate an outsourced business model, working with c.1300 suppliers. In 2024, we had a total net supplier spend of c.£1billion. … In total, we currently have 63 material suppliers, representing 40% of our total third-party spend in 2024. The material suppliers are providing services from the UK, United States, Luxembourg, Ireland, France, India, Sri Lanka, Malaysia, Philippines, China, Mexico, Germany, Australia, Netherlands, and Mauritius. Our largest Business Process Outsourcing (BPO) service provider has some operations in India which, according to Walk Free Modern Slavery Index, carries a higher risk of modern slavery.

Sourcing categories	
Technology	IT hardware, software licenses, and Professional Services
Asset Management	Bespoke platforms for customers and Marketing Services
Market Data	Services from Credit Referencing Agencies
Business Process Outsourcing (BPO)	Includes consulting, advisory, and legal services
Temporary Staffing	
HR	Private medical insurance, training, and recruitment services
Travel	
Events	
Premises	Building maintenance and catering services

Phoenix Group Holdings, 'Modern slavery statement 2025'[64]

Question 10

Did the company provide information about its policies in relation to modern slavery?

Corresponding standards

Home Office guidance 2021

Rationale

Corporate attempts to tackle modern slavery should be supported by strong internal governance. Policies are the first step in a company's risk management process.

Scoring

0	There is no evidence that the company has policies in relation to modern slavery.
1	There is evidence that the company has policies in relation to modern slavery.

Question 11

Did the company provide information about its due diligence processes in relation to modern slavery in its **business**?

Corresponding standards

Home Office guidance 2021

Rationale

Due diligence processes are important in protecting workers, helping to identify cases of exploitation and allowing for remediation. This question assesses whether due diligence processes have been implemented within the direct operations of the business.

Scoring

0	There is no discussion of any due diligence processes used within the company's direct operations.
1	There is at least one example of due diligence processes used within the company's direct operations.

Question 12

Did the company provide information about its due diligence processes in relation to modern slavery in its **supply/service chains**?

Corresponding standards

Home Office guidance 2021

Rationale

Due diligence processes are important in protecting workers, helping to identify cases of exploitation and allowing for remediation. Given the global nature of supply/service chains, most companies will be exposed to modern slavery risks and should institute due diligence processes to mitigate these risks.

Scoring

0	There is no discussion of any due diligence processes used within the company's supply/service chains.
1	There is at least one example of due diligence processes used within the company's supply/service chains.

Question 13

Did the company provide information about the parts of its **business** where there is a risk of modern slavery taking place?

Corresponding standards

Home Office guidance 2021

Rationale

This question assesses whether companies have disclosed the parts of their business that have the highest risk of modern slavery. Identifying and disclosing high-risk areas provides evidence that a company has undertaken a risk assessment.

Scoring

0 There is no information given about the parts of the company's direct operations where there are modern slavery risks.

1 There is information about the parts of the company's direct operations where there are modern slavery risks.

> Our direct operations have been deemed to be predominantly low risk. Most of our colleagues work in knowledge based, office-based roles that require specialist qualifications such as accountancy, procurement and human resources. However, like many in the financial sector, we are aware of the risk of potential exposure to modern slavery through our operations, supply chain and value chain.
>
> Investec, 'Modern Slavery Act statement 2025'[65]

2

Investec

Financials

> We recognise that certain roles have higher levels of modern slavery risk, such as housekeeping, which is why we have ensured this role is directly employed in the UK and Ireland ...
>
> We take the potential issue of child or adult exploitation very seriously. We recognise that there is a risk in all hospitality companies that hotels might be used for the sexual exploitation of adults or children, or the harbouring/movement of adults and children for the use of forced labour.
>
> Whitbread, 'Modern slavery statement 2024/25'[66]

2

Whitbread

Consumer discretionary

Question 14

Did the company provide information about the parts of its **supply/service chains** where there is a risk of modern slavery taking place?

Corresponding standards

Home Office guidance 2021

Rationale

Disclosing the parts of a supply/service 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/service chain is often the highest-risk part of any company's operations.

Scoring

0 There is no information about the geographies, products, commodities or labour types that are part of a company's supply/service chain and have higher modern slavery risks.

1 There is information about the geographies, products, commodities or labour types that are part of a company's supply/service chain and have higher modern slavery risks.

3

ITV

Communications

This year we have continued to focus on the supply chains for workplace services, TV production and merchandise as our priority areas for addressing potential slavery and trafficking risks …

Merchandise continues to be an area of modern slavery risk for ITV as some of it is manufactured in low cost countries … Higher risk for ITV are the supply chains for our global merchandise deals, where we enter into licences with third parties (licensees) for the use of ITV's intellectual property for the creation, production and distribution of consumer products by the licensees on their own account.

ITV, 'Modern Slavery Act transparency statement March 2025'[67]

Question 15

Did the company describe steps it had taken to **assess** the risk of modern slavery in its **business**?

Corresponding standards

Home Office guidance 2021

Rationale

Companies need to prioritise 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 for their direct operations and supply/service chain (although this question only covers a company's direct operations).

Scoring

0 There is no information about how a business risk assessment was conducted.

1 There is information about the ways in which risk assessments are conducted for direct operations and how this process results in an active risk management approach.

Despite our operations being rated low risk we are adding an extra level of due diligence for our own employees. We are undertaking a review of duplicate bank accounts (3 or more people using the same account details) as well as shared addresses. These checks will be performed within our UK businesses with the aim of extending the approach to all our core businesses.

Sharing bank accounts, addresses or telephone numbers can be a red flag as they may be an indication of unethical behaviour and can be linked to modern slavery.

Aviva, 'Aviva's modern slavery and human trafficking statement 2024'[68]

2 £

Aviva

Financials

1

Kingfisher

Consumer discretionary

We have identified a low risk of modern slavery occurring in our business operations and among our direct employees, based on our human rights Saliency Assessment …

In 2023, as part of our ongoing partnership with Slave-Free Alliance (SFA), we requested them to conduct an independent Human Rights Gap Analysis, identifying good practices and areas for improvement across our operations and supply chain. This review assessed our approach to modern slavery and labour exploitation risks, ensuring alignment with relevant legislation and industry best practices. Slave-Free Alliance engaged with key internal stakeholders, including the Human Rights and Modern Slavery Working Group, alongside teams from Responsible Business, O&S [Offer and Sourcing] (GFR [goods for resale], Group Procurement GNFR [goods not for resale], Logistics, Legal Compliance, Internal Audit/Risk, People/HR, Inclusion and Diversity, and banner Sustainability leads. This aligns with the previous Saliency Assessment findings, confirming that those risks remain relevant.

The gap analysis process also helped us identify vulnerable people groups that may be found within our supply chains and operations: indigenous communities, migrant workers, minority ethnic groups, agency and temp workers, children and young workers, female workers and remote/isolated workers. Additionally, the salient human rights issues previously identified in our Saliency Assessment were confirmed as still relevant key risk areas within our supply chains.

Kingfisher, 'Modern Slavery Act transparency statement 2024/25'[69]

Question 16

Did the company describe steps it had taken to **manage** the risk of modern slavery in its **business**?

Corresponding standards

Home Office guidance 2021

Rationale

Managing and mitigating the risk of modern slavery within direct operations is a material and salient issue for companies. Risk management processes are crucial for protecting workers and also for limiting the potential reputational risk incurred by modern slavery cases.

Scoring

Score	Description
0	There is no information about the company's business risk management process.
1	There is information about the risk management process the company uses in its direct operations and how this process results in an active risk management approach.

2

Rio Tinto

Industrials

A risk-based approach to training

All employees

In 2024, we launched a new annual Code of Conduct training. This mandatory training sets the foundation for our work, guiding ethical decision making and promoting a safe and respectful environment. It incorporates human rights and modern slavery, illustrating the values, commitments and behaviours we expect of our people. The training is available in 2 formats: an e-module (for digitally connected employees) or a video (for site-based employees). It empowers our people to seek guidance on human rights issues, helping to prevent incidents and harm from occurring.

Higher-risk roles

In 2024, we developed and launched the Human Rights in Action program. It is mandatory for senior leaders in higher-risk roles, but is also available to any interested employee. Higher-risk roles were identified based on criteria including seniority, role, and external context – looking at whether that leader may be exposed to significant human rights risks. Designed by learning and human rights experts, the program combines behavioural science, and experiential- and scenario-based learning to enhance awareness and capability at senior levels. The program includes:

- online webcast in multiple languages
- scenario-based self-directed learning
- interactive toolkit

We use storytelling and interactive learning to help leaders apply a human rights lens to daily decision making and cascade human rights knowledge throughout the business. We will apply feedback from the 2024 program and relaunch the course in 2025. In addition, we are working with learning experts to develop outcome learning metrics to measure the impact of our learning program more broadly. Our Executive Committee attended an immersive face-to-face session which included working through a human rights issue integrated with other code of conduct issues.

Rio Tinto, 'Modern slavery statement 2024'[70]

Question 17

Did the company describe steps it had taken to **assess** the risk of modern slavery in its **supply/service chains**?

Corresponding standards

Home Office guidance 2021

Rationale

Companies need to prioritise resource-intensive due diligence mechanisms for the parts of their supply/service chains where the modern slavery risks are the highest. To do this, they should conduct a comprehensive risk assessment for their direct operations and supply/service chain (although this question only covers a company's supply/service chain).

Scoring

0	There is no information about how a supply/service chain risk assessment was conducted.
1	There is information about the ways in which risk assessments are conducted for the supply/service chain and how this process results in an active risk management approach.

2

Informa

Communications

"

Taylor & Francis's Global Supplier Management team operates an ongoing program to proactively identify and mitigate modern slavery risks across our supply chain.

Our approach is built on three key pillars.

- First, we conduct annual supplier assessments using modern slavery and human rights questionnaires, analysing changes in responses year over year.
- Second, we maintain continuous engagement with our suppliers through direct communication channels and, where appropriate, conduct on-site visits to verify reported information and identify any potential concerns.
- Third, we work closely with our trained local business teams, especially in key supplier regions such as India, to perform thorough site inspections.

Throughout our 2024 supplier site visits and assessments, we found no evidence of modern slavery or child labour practices.

Informa, '2024 Modern Slavery Act statement'[71]

Question 18

Did the company describe steps it had taken to **manage** the risk of modern slavery in its **supply/service chains**?

Corresponding standards

Home Office guidance 2021

Rationale

Managing and mitigating the risk of modern slavery within the supply chain is a material and salient issue for companies. Risk management processes are crucial for protecting workers in the supply/service chain, who in many cases are at higher risk for modern slavery than direct employees.

Scoring

0 There is no information about the company's supply/service chain risk management process.

1 There is information about the risk management process the company uses in its supply/service chains and how this process results in an active risk management approach.

2

Legal & General Group

Financials

Case study

Audit with a labour provider

One of our suppliers provides labour to some of our UK offices. On average, 123 contractors from the supplier work across these UK offices on any given working day.

Overview of the audit:

- in October 2024, Achilles undertook an ethical employment audit with this supplier at its head office and at some of our UK offices (one audit was conducted remotely)
- as well as assessing systems, policies and contracts at the supplier's head office, Achilles interviewed 52 contractors working across these three offices (these individuals were either working directly for our supplier or through sub-contractors)
- all worker interviews took place in individual rooms so workers could not be overheard by anyone
- workers on each of the sites were carrying out a number of roles, providing different services as required at each site
- the worker wellbeing audits were all unannounced.

What was discovered, what actions were taken and what is the outcome?

Across all three sites, 23 findings of concern were raised and eight observations.

What was discovered	What actions were taken	Outcome/next steps
Contracts/pay concerns: • some individuals stated they had not received their contract and/or relevant right to work checks had not been made • some workers stated that they had not received any information regarding modern slavery and its indicators • one worker said they were not being paid the real Living Wage • some workers stated they felt that overtime was not voluntary and that it was paid at a flat rate.	The management system audit confirmed that: • appropriate right to work checks using home office approved Identified Document Validation Technology (IDVT) software were undertaken • all employees had contracts in place • all employees working on L&G sites were being paid the real Living Wage. As this appears to be a communication issue, the supplier has been instructed to create an easy-to-use guide (electronic and physical versions) for any contractors working on L&G sites that provides information such as: • how employees can access their contracts and payslips • HR contact information • modern slavery information and key indicators to be aware of. The supplier confirmed it will be communicating to its employees that they have a right to refuse to carry out overtime without sanction.	The supplier will be launching this new guide in 2025 at an internal event and addressing the concerns raised via this audit. A review of the induction process is underway and will be completed in 2025.
One worker stated that they were working 13 hours a day (at two sites, one of which was L&G), which was seen to contravene the Company's own Fatigue Management Policy (which states that a worker will have at least 12 hours' rest between shifts).	The supplier is investigating this, with an update due in 2025.	N/A
Sub-contractor concerns flagged: • one worker (agency worker) stated that their pay was often delayed • the supplier was not able to demonstrate that they had conducted any checks to be assured that its supply chain partner was securing right to work information/evidence in an appropriate manner • the supplier does not conduct any additional due diligence on suppliers which have been identified as high risk for modern slavery.	The supplier has requested attestation to L&G's Supplier Code of Conduct from all key sub-contractors aligned to the L&G account. The supplier will also provide detail of the onboarding process for its new suppliers for L&G to review in 2025.	L&G to undertake a sub-contractor review in 2025 (with regard to this supplier). This review will include sub-contractor compliance with ethical employment requirements.
At one site, services were carried out by agency (sub-contractor) workers, including different workers on consecutive nights who were told to sign in as the same person.	A review is underway with findings expected in 2025.	N/A

Our next steps

- The supplier agreed to update its induction process to ensure clear understanding of terms of employment. This will be rolled out in 2025.
- We will continue to work with this supplier on the concerns raised via the audit and ensure that any risk of modern slavery or labour irregularities within our supply chain is prevented.

Legal & General Group, 'Modern slavery statement 2024'[72]

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?

Corresponding standards

Home Office guidance 2021

Rationale

Monitoring is key to understanding how well a company's approach to modern slavery is working and where there are gaps. Setting key performance indicators (KPIs) and reporting against them allows companies to track their progress and demonstrate their ongoing commitment to developing their approach.

Scoring

0 There is no disclosure of KPIs and/or no evidence that the company is tracking and reporting its progress against these targets.

1 There is disclosure of the KPIs used and evidence of reporting against these targets.

2

BP

Energy

Focus area	Status	Progress in 2024
Continue to scale LRMS risk management activities to cover additional suppliers.	Progress made	• Evaluated 418 suppliers through pre-contract and existing supplier self-assessment questionnaires (2023 245). • Completed 14 on-site supplier assessments including one global supplier (2023 15). • Started three global supplier on-site assessments.
Broaden focus to include goods suppliers.	Complete	• Expanded pre-contract evaluations to include high-risk goods suppliers, evaluating 75 of these in 2024.
Build more guidance and support on remedy.	Progress made	• Developed draft guidance to support work with our businesses on remedy of concerns by suppliers. This objective is being continued into 2025.

BP, 'UK modern slavery and human trafficking statement 2024'[73]

2

RELX

Industrials

Direct Operations	2024 Objective	Status	This is what we did	2025 Objective
	Continue to deploy training across the company, targeting departments at high-risk of modern slavery.	Ongoing	In 2024, nearly 1000 employees completed online training in modern slavery awareness across teams in procurement, Exhibitions, facilities and corporate responsibility.	Continue to deploy training across the company, targeting departments at high-risk of modern slavery.
	Ensure modern slavery awareness training engages contingent workers.	Ongoing	We are working to ensure all contingent workers undertake modern slavery awareness training through their relevant service providers and track progress.	Continue to work with contingent workers to ensure they have access to modern slavery awareness training.
	Continue living wage assessments in further 5 geographies and create a plan to ensure a continuous review to meet living wage standards for all employees.	Ongoing	During 2024 we completed living wage assessments in all countries where RELX has more than 50 employees, representing 99% of our employee population. This work was undertaken using benchmarking from The WageIndicator Foundation.	Continue living wage assessments globally.

Supply Chain	2024 Objective	Status	This is what we did	2025 Objective
	Increase # of suppliers as Code Signatories; continue using audits to ensure continuous improvement in supplier performance and compliance.	Ongoing	In 2024, there were 914 suppliers on the SRS tracking list, 72 of which were in high-risk countries and 698 in medium-risk countries. 747 of the suppliers (82%) on the SRS tracking list have signed our Supplier Code, or have equivalent standards in place. At the end of 2024 there were 6,056 signatories to our Supplier Code, or have an equivalent code, representing an increase of 13.7% from the 5,322 signatories at the end of 2023.	Continue to increase number of suppliers as Code signatories; continue using audits to ensure continuous improvement in supplier performance and compliance.
	Work with Suppliers to ensure they undertake Modern Slavery Awareness training.	Ongoing	During the year we invited 90 suppliers on our tracking list for training on ‘Employment is freely chosen’ and ‘Child labour shall not be used’.	Continue to work with suppliers to ensure they undertake Modern Slavery Awareness training.
	Continue to work with suppliers to support their learning.	Ongoing	In 2024 we hosted exclusive supplier sessions “Navigating Ethical and Sustainable Practices”. These sessions focused on transformational governance, raising awareness of modern slavery issues in the supply chain and science-based targets.	Continue to work with suppliers to support their learning.

RELX, ‘Modern Slavery Act statement’[74]

Question 20

Did the company provide information about modern slavery training provided to staff?

Corresponding standards

Home Office guidance 2021

Rationale

Training is a key part of embedding a modern slavery governance structure. Training helps 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 the company's agenda.

Scoring

0	There is no information about staff training on modern slavery.
1	There is information about staff training on modern slavery.

Find it

For this section, all information disclosed by the company in the public domain is eligible for consideration.

In this framework, we consider tier one to consist of suppliers with a direct relationship with the business, excluding buying agents. The tier two supply chain consists of the direct suppliers to tier one, and so on. See page 27 for more information.

Question 21

Did the company state that it is continuing to map the extent of its operations and supply/service chains?

Corresponding standards

BHRRC 4.3

Rationale

Mapping the supply/service chain is an ongoing process undertaken to understand where products come from and where tier one suppliers' sub-suppliers are located. This process is crucial in combatting modern slavery because visualising the supply/service chain allows for high-risk areas and groups to be identified. Given the ever-changing nature of business relationships and supply/service chains, companies should engage in ongoing mapping.

Scoring

0	There is neither evidence of current supply/service chain mapping nor a commitment to continue this process.
1	There is evidence that the company has started mapping the supply/service chain beyond tier one and there may also be evidence that it is continuing this process.

"

The solar sector has heightened exposure to human rights risks as a significant portion of the global supply of polysilicon, an important raw material for solar panels derived from quartz, and its related supply chains originate in Xinjiang. This processing of materials and manufacturing of photovoltaic panels is undertaken by many Chinese manufacturers at all levels of the supply chain. Many of those suppliers are alleged to have significant interests in Xinjiang.

Through membership of solar industry technical and trade associations in Europe, DCC businesses continue to work with other purchasers of solar products to seek greater transparency through traceability mapping and auditing of facilities aimed at eradicating forced labour in solar supply chains.

DCC, 'Slavery and human trafficking statement for the year ended 31 March 2025'[75]

3

DCC

Industrials

"

Primark's partnership with TrusTrace, which started in 2022, enables Primark to gather data from across its product supply chain, from raw materials through to finished product. This programme is run by a dedicated Transparency and Traceability team operating within Primark's Sourcing team. In 2023/24, Primark reached 100 suppliers and increased the number of raw materials mapped to the four main materials Primark uses: cotton, polyester, man-made cellulosic fibres (such as viscose) and nylon. Primark continues to train suppliers on its traceability expectations.

Associated British Foods, 'Responsibility report 2024'[76]

1

Associated British Foods

Consumer staples

Question 22

Did the company disclose the locations of its tier one suppliers?

Corresponding standards

BHRRC 1.5; KTC 2.1

Rationale

Understanding where tier one suppliers are located is a crucial first step in a modern slavery risk assessment.

Scoring

0 There are no disclosures of tier one supplier locations, or locations are given as continents or regions.

1 There is a partial list of supplier locations, to at least country level.

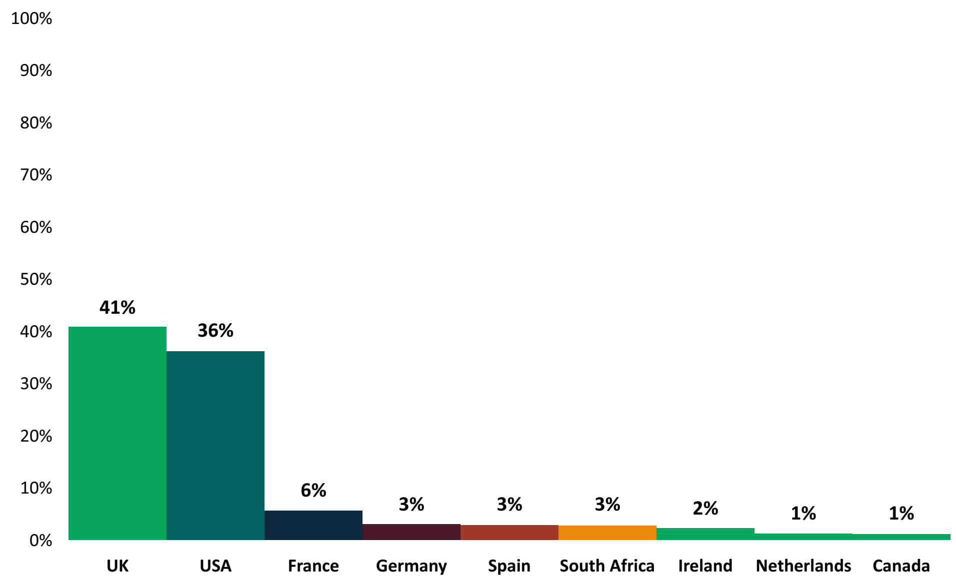
2 There is a list of supplier locations with addresses, covering all suppliers or a high-risk sector.

3

Sage Group

Information technology

Figure 1: Our top 10 supplier countries by % of spend



Sage Group, 'Modern slavery statement FY24'[77]

Note: this is an example of good practice for disclosing a list of supplier locations to a country level (1 point).

1

NEXT

Consumer discretionary

Supplier name: Calzificio Eire Sr l
Manufacturing site name: Italstyle Shpk
Address: Kombinati Tekstileve 5000 Berat, Albania
Product type: Apparel
Female employees: 25
Male employees: 175
Trade union in factory: No
Freely elected workers committee: Yes.

NEXT, 'Tier 1 manufacturing sites – produced February 2025'[78]

Question 23

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

Corresponding standards

BHRRC 1.5; KTC 2.1

Rationale

Mapping suppliers beyond tier one is necessary for comprehensive supply chain transparency. Evidence has shown that 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	There are no disclosures of tier two or lower supplier locations, or locations are given as continents or regions.
1	There is disclosure of tier two or lower supplier locations to at least the country level.

2 £

London Stock Exchange Group

Financials

Top 10 sourcing locations: Tier 2 suppliers

United Kingdom:	44	**Australia:**	7
United States:	32	**Singapore:**	6
Hong Kong:	11	**Netherlands:**	4
Japan:	8	**United Arab Emirates:**	2
India:	7	**Cyprus:**	1

London Stock Exchange Group, 'Modern Slavery Act statement'[79]

Question 24

Did the company provide details of how it analyses the overall supply/service chain by risk (e.g. in relation to sourcing, geography, commodity, manufacture and spend)?

Corresponding standards

BHRRC 1.5; 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 have ongoing monitoring using site-level data, and this is awarded the highest number of points.

Scoring

0 There is no disclosure of the factors that influence the risk assessment process.

1 There is disclosure of the factors that influence the risk assessment process.

2 There are detailed disclosures of how specific geographies and/or commodities affect how risk assessments are conducted.

3 There is disclosure of how risk assessment data gathered on site influences the risk assessment process.

2

Lloyds Banking Group

Financials

There are a number of reasons that the construction industry globally and here in the UK continues to be a high-risk sector for modern slavery and the exploitation of workers through labour abuse:

- Roles that are low wage and relatively lowskilled
- High numbers of migrant workers, some with limited right to work
- Moving onsite and offsite over a project development
- Widespread sub-contracting, with many different workers

Recognising the high-risk nature of the construction sector in the UK, this year we undertook a review at our largest construction site with the largest number of general labour operatives. We worked with our partners, Unseen, to carry out an initial visit at a project site and conduct employee wellbeing visits to engage onsite operatives on a confidential basis, to ensure they are not at risk, or currently victims of modern slavery, forced labour or financial exploitation. This provided us with valuable insight into the risk of operatives working on construction sites managed by suppliers on behalf of the Group.

Lloyds Banking Group, 'Modern slavery and human trafficking statement 2024'[80]

Note: this is an example of leading practice in demonstrating how geography, commodity or sector influences a modern slavery risk assessment (2 points).

Our 2023 top-down human rights risk assessment identified the Group's salient human rights risks. To complement this, we will carry out bottom-up risk assessments across our locations. We conducted our first one in Brazil in 2024, running a human rights workshop with the leadership team, identifying risks bespoke to Brazil. We assessed the likelihood and severity of these risks, carried out listening groups with service provider employees and conducted social audits of our manufacturing sites in Campinas and Holambra.

Croda International, 'Sustainability impact report 2024'[81]

2

Croda International

Materials

The starting point for our risk assessment is an external view of risk. To establish this view, we sought advice from a range of external stakeholders: NGO, Multi-Stakeholder Initiative, and specialist consultants were involved in our risk assessment process.

Combining these points of view gave us a holistic external view of risk, scored on a scale of one to ten, with ten being the highest risk. This scoring was applied to all clauses of our code of conduct for our top sourcing countries. Alongside this, we analysed twelve months of our own audit data and used this to compare with the external abstract theory of risk from our stakeholders. Again, the audit data was ranked one to ten with ten being the highest risk or occurrence. Using our audit data and expertise of our regional teams we then identified how risks manifested against each clause of our code of conduct in each of the top sourcing countries.

Primark, 'Modern slavery statement 2024'[82]

1

Associated British Foods

Consumer staples

Question 25

Did the company provide information on the workforce in both its **operations** and its **supply/service chain**?

Corresponding standards

KTC 2.1

Rationale

Knowing the number of employees in a company's direct operations and supply/service chain is another part of mapping the supply/service chain. It allows companies to visualise their workforce, identify risks and know who they are responsible for.

Scoring

0 No information is given or the only information disclosed is the number of direct employees.

1 The number of direct employees and the number of workers in the supply/service chain have both been disclosed, demonstrating that the company understands the scope of its workforce.

2 There is a more detailed breakdown of the supply/service chain workforce by location or vulnerable characteristics, in addition to disclosure of the number of direct employees and supply/service chain workers.

2

SSE

Utilities

SSE's direct workforce at 31 March 2024:

- 13,891 employees working across offices, depots, operational sites and construction sites
- 92% employees were based in the UK and 7% were based in Ireland ...

SSE's contingent workforce at 31 March 2024, which is additional to SSE's in-direct workforce:

- 2,364 people carry out work using SSE's IT systems and/or on SSE premises as consultants, temporary agency workers, and contractors
- 91% are working in the UK and 9% in Ireland ...

Due to the nature of SSE's operations, the number of workers within its supply chain will vary substantially throughout the year.

Although it is not possible to directly monitor supply chain worker numbers, SSE works with PwC every year to better understand the value it contributes to the UK and Irish economies, including through its supply chain activities.

In 2023/24, the analysis showed that SSE's activities supported a total of 56,500 full time equivalent (FTE) jobs across the UK and Ireland including 36,170 FTE jobs through indirect contribution generated by supply chain spend.

SSE, 'Human rights report and modern slavery statement 2024'[83][84]

Note: this is an example of good practice for disclosing the number of workers in a company's direct operations and supply/service chain (1 point).

1

Burberry Group

Consumer discretionary

At Burberry, we have:

Over

8,450 employees

129 nationalities

32 Responsibility specialists

Across

32 countries and territories

422 stores

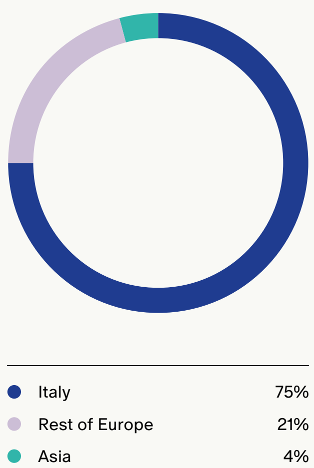
5 Distribution hubs

Revenues of

£2.46bn in FY 2024/25

Tier 1 suppliers – FY 2024/25 in numbers:

687 production sites



Tier 1 suppliers – workforce profile FY 2024/25:

Total workforce

61,495 workers

Average number of workers per facility

90

Gender split

29% male

71% female

Collective bargaining

About 78% of the Tier 1 production sites, we source from are covered by national and/or industrial collective bargaining agreements

Burberry Group, 'Burberry modern slavery statement 2024/25'[84]

Question 26

Did the company identify the recruitment of migrants or temporary labour as a human rights risk?

Corresponding standards

KTC 2.1

Rationale

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

Scoring

0 The risks surrounding the recruitment of migrants and other temporary labour are not identified.

1 Migrant or temporary workers are identified as strongly at risk of modern slavery.

Question 27

If so, had the company provided details of how migrants and/or temporary labour are recruited?

Corresponding standards

KTC 2.1

Rationale

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

Scoring

0 No information is given about the recruitment of migrant or temporary labour.

1 Details are disclosed of risk management processes specifically related to the recruitment of migrant and/or temporary labour.

2

Haleon

Health care

In 2024, Haleon businesses continued to implement elements of Haleon's labour provider action plan, developed in response to a 2023 assessment of our third-party labour provision. This plan includes more stringent screening of labour suppliers, increased due diligence in high-risk regions, stronger contractual obligations on suppliers, and ongoing monitoring of sites and third-party workforce.

Haleon, 'Human rights statement 2024: covering modern slavery, decent work, forced labour and child labour'[85]

Carnival

Consumer discretionary

Addressing recruitment risks

In order to address modern slavery risks in our shipboard recruitment activities, we require Business Partners who provide crew recruitment and resourcing services (referred to as global talent partners) to be certified in line with the MLC [Maritime Labour Convention]. The MLC establishes standards regarding the minimum working and living conditions of seafarers including:

- minimum requirements for seafarers to work on a ship, including minimum age requirements;
- conditions of employment;
- accommodation, recreational facilities, food and catering;
- health protection, medical care, welfare; and
- social security protection.

We also perform our own audits of these Business Partners on a regular basis, monitoring their job assignment processes, recordkeeping, pre-employment screening, and post-employment follow-up. Detailed crew employment records are maintained in local recruiting offices and at our headquarters.

Carnival, 'Transparency in supply chains statement'[86]

Question 28

Did the company provide details of how the risk assessment of its operations and supply/service chain was carried out, including which indicators, resources and tools were used and/or which experts, stakeholders and civil society organisations were consulted?

Corresponding standards

BHRRC 3.6, 4.2, 4.5, 4.6, 4.7;
KTC 1.5, 2.2; S2G 19, 20; UNGPRF B2

Rationale

The tools used in a risk assessment are another 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.

Scoring

0 There is no information about the tools used to conduct the risk assessment.

1 The risk assessment is founded on desk-based analysis.

2 The risk assessment process engages with multi-stakeholder or industry initiatives related to modern slavery.

3 The risk assessment incorporates dialogue with the rights holders themselves or their representatives on the ground.

2

Centrica

Utilities

We continued to work with our partner, AndWider, to deploy remote worker surveys in conjunction with on-site audits, because of the valuable insight provided into working conditions ...

In 2024 we deployed remote worker surveys to workers at seven suppliers covering garments, technology and distribution. The results of the surveys identified reports in several areas including wages and working hours and health and safety ...

These surveys provide additional insight direct from the workforce which are viewed in conjunction with the adjacent site audit, feeding into continuous improvement by providing the worker perspective outside of a formal audit.

Centrica, 'Our modern slavery statement 2024'[87]

1

Reckitt Benckiser Group

Consumer staples

Our Human Rights programme considers human rights issues in the context of local conditions. We do this through targeted human rights impact assessments that focus on understanding the impacts affecting a particular country and part of our business in more detail.

We are committed to conducting 10 human rights impact assessments by 2030. To date, we have completed three assessments including Thailand (covering our Durex and Enfa brand value chains), Brazil (covering the value chains of our Olla condoms, SBP Aerosol Pesticides and Veja Multipurpose Cleaners) and Poland (covering our Finish and Strepsils brand value chains).

Each assessment takes a number of months to consider the value chain in the country and engage local stakeholders on human rights issues.

Reckitt Benckiser Group, 'Modern slavery and human trafficking statement 2024'[88]

3

Smith & Nephew

Health care

Case Study: On-site audits

In 2024, we continued on-site audits of some of our raw materials suppliers in Asia-Pacific. As part of our pilot to combine on-site social audits with supplier quality audits, we selected suppliers to align with our supplier audit schedule. The audits focused on supplier compliance with our policies and procedures and applicable law and regulations, including Modern Slavery, and sub-tier supplier management. We conducted interviews with employees in various positions, including shop floor workers, and spent time in the factory to enable verification of the information previously provided.

Smith & Nephew, 'Modern Slavery Act statement for the year ended 31 December 2024'[89]

Question 29

Did the company disclose its most salient modern slavery risks?

Corresponding standards

BHRRC 4.1, 4.4, 4.8, 4.9;
KTC 2.2; S2G 17; UNGPRF B1

Rationale

The UN Guiding Principles Reporting Framework defines salient human rights issues as 'the human rights at risk of the most severe negative impact through the company's activities and business relationships'.[90] This means companies should disclose risks to workers or rights holders, rather than high-risk business areas. Naming the 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	There are no named salient risks and/or the company has not described how these risks could manifest in its business.
1	The company has named salient risks and described their likelihood and how they can occur.

2

United Utilities Group

Utilities

To provide great water for a stronger, greener and healthier North West, we need the right tools and equipment to do our jobs, but we also need to keep ourselves and our people safe. The production of Personal Protective Equipment in certain geographical regions has been identified as a high-risk area for modern slavery, with hotspots in Xinjiang region and forced labour camps, concerns in Malaysia and Taiwan around sourcing PPE, and difficulties accessing sites in South-East Asia to conduct audits without lengthy notice ...

We work with many suppliers for waste management across our operational sites who are all UK based. Waste and recycling have long been a complex industry with intricate supply chains, multiple service providers and jobs that attract 'low skilled', temporary workers ...

The waste management sector in the UK has a large reliance on temporary labour agencies and migrant workers, more recently from North-Eastern Africa, particularly where manual sorting or picking is required. There are known high staff turnover rates which can create vulnerabilities for modern slavery and labour exploitation.

United Utilities Group, 'Anti-slavery and human trafficking statement 2025'[91]

2

Intertek Group

Industrials

Our risk assessment process has raised the following specific issues:

- we have a number of seasonal workers in higher risk countries, including a few migrant workers in certain countries. We are aware that such workers are at increased risk of abuses (such as excessive working hours and withholding of salaries) with reduced access to legal protections. We believe that our on-boarding, training, monitoring and reporting processes adequately mitigate the increased risk to these workers.
- we deploy inspectors to ports and terminals around the world to attend the discharge of cargo vessels. Weather conditions and delays in berthing can mean that our inspectors are required to spend hours waiting for a vessel to arrive in order to perform their duties. There can be pressure placed on inspectors not to take rest times so that discharge can proceed as quickly as possible and demurrage fees can be avoided. We are aware that this can lead to a risk that working time restrictions can be breached. We believe that our training of inspectors, our close monitoring of their working time and our technology-enabled scheduling solutions mitigates this risk.

Intertek Group, 'Modern slavery statement 2024'[92]

Question 30

Did the company include a discussion of which supply/service chain auditors or partners it had appointed, including how it had assured the competency of the appointed auditors or partners in finding and detecting modern slavery?

Corresponding standards

BHRRC 3.4; KTC 6.2.4 (modified)

Rationale

Due diligence procedures will vary 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/service chain. However, it is not without its critics, who point to significant flaws and opportunities for audit fraud. Companies should ensure that auditors or partners are suitably qualified to identify modern slavery where it may exist.

Scoring

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

1 The company gives information about how it has verified the competency of its auditors or partners through disclosing auditor accreditation, using human rights specialists, disclosing multiple specialist audit techniques used and/or internally reviewing third-party audits to check their effectiveness.

> We monitor the effectiveness and service quality of the audit companies we use on an ongoing basis. In 2024/25, we launched our global Witness Audit Programme to strengthen the quality and integrity of our human rights audits. This initiative ensures that all audits are conducted by industry-leading auditors, reinforcing our commitment to accountability and excellence.
>
> Of the Witness results, 88% aligned with our expectations and are recognised as Tesco-approved auditors. We will only reconsider approving those auditors who didn't meet our expectations when solid evidence of their improvement is provided and we have witnessed an audit that meets our expectations. Additionally, we introduced the Witness Champion Programme this year to empower our audit service providers with self-monitoring capabilities. Champions will now begin witnessing our approved auditors every 12–24 months to ensure alignment with Tesco's values and standards during audits.

Tesco, 'Modern slavery statement 2024/25'[93]

1

Tesco

Consumer staples

> We have continued our Work Practice Audit Programme with Unseen conducting on-site audits with our highest-risk suppliers. These audits provide an effective way of creating transparency into working practices within our supply chain. Through unannounced one to one interviews with individuals, working on site, employed by our contractors, a range of potential issues associated with modern slavery are explored.

British Land, 'Slavery and human trafficking statement 2024'[94]

3

British Land

Real estate

Question 31

Did the company disclose how suppliers were prioritised for audit purposes?

Corresponding standards

KTC 6.1

Rationale

All companies with a supplier audit policy will have a prioritisation process. Some will decide to audit all suppliers supplying goods for resale, but others may audit based on risk level. This question seeks to understand what that process is, rather than judging its suitability for addressing the risks.

Scoring

0	There is no information on the audit prioritisation process.
1	There is a discussion of the audit prioritisation process.

Question 32

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

Corresponding standards

KTC 6.1

Rationale

A comprehensive audit process is crucial for combatting modern slavery. This question seeks to understand how robust a company's audits are. Protocols such as unannounced visits, off-site interviews and audits of associated production facilities demonstrate an advanced audit process that has ways to ensure audit integrity and elicit more information from workers who are unwilling to share in front of management.

Scoring

0	There is no information on the audit protocols used.
1	There is brief detail on the audit protocols used.
2	There is detailed discussion of multiple audit protocols used.

2

JD Sports Fashion

Consumer discretionary

We utilise a range of audits and assessments to check conditions in factories that make our products. Due diligence includes (but is not limited to): Identification and verification of product-manufacture locations and facilities, site safety and documentation inspections, worker interviews, off-site assessments, and accommodation checks.

JD Sports Fashion, 'Ethical code of practice'[95]

2

Aviva

Financials

13 suppliers participated in our 2024 Modern Slavery threat assessment process[.] 5 out of 13 assessments were conducted through in person site visits and included a worker voice element. They covered our operations across the UK, Ireland, Canada, India, Aviva CofCo China, and our subsidiary Solus. Suppliers fall into the following sectors that have been identified as high and medium risk: car repair, car valeting, call centre, claim management support, property repair service provider, building contractor, and security and housekeeping manpower providers.

The assessments were conducted through management interviews, document reviews, and worker interviews to evidence suppliers' practices. Using a risk-based approach, we excluded professional service suppliers such as strategy consultancy and legal service providers. We assessed suppliers based on modern slavery risks linked to their sector, geographical location, and reliance on manual labour where potentially at risk workers might be present e.g., low-skilled migrant workers.

Aviva, 'Aviva's modern slavery and human trafficking statement 2024'[96]

Question 33

Did the company include in its audit protocol any monitoring beyond tier one and/or did its supplier code of conduct include an expectation that monitoring is cascaded down the supply/service chain?

Corresponding standards

KTC 6.1

Rationale

Companies should ensure that their audit processes are replicated down their supply/service chain as the most vulnerable workers are often further down the chain.

Scoring

0 There is no statement that audits are conducted down the supply/service chain.

1 There is a commitment to auditing beyond tier one.

Question 34

Did the company ensure there is one or more grievance mechanism(s) (its own, third party or shared) available to all workers in its operations and the supply/service chain to raise human-rights-related concerns (including labour conditions) without retaliation?

Corresponding standards

BHRRC 3.8; 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 operations and the supply/service chain.

Scoring

0 There may be a grievance mechanism, but it is not available to both direct operations and supply/service chain workers.

1 There is a grievance mechanism available to workers in the company's own operations and in supply/service chains.

Question 35

Did the company disclose the number of whistleblowing reports that were flagged for concern?

Corresponding standards

BHRRC 3.8; KTC 5.3; S2G 35; (see also ETI)

Rationale

An indicator of the effectiveness of grievance mechanisms is whether workers are using them to report concerns. Grievance mechanisms should be open to both employees in a company's direct operations and workers in supply/service chains. Reporting the number of whistleblowing reports flagged for concern relating to modern slavery and/or human rights issues also demonstrates that these reports are being actively managed.

Scoring

0	The number of whistleblowing reports has not been disclosed.
1	The number of whistleblowing reports has been disclosed.

Question 36

Did the company disclose finding modern slavery and/or indicators of modern slavery (e.g. the International Labour Office's 11 indicators of forced labour[97]) in its value chain this year?

Corresponding standards

UNGPs

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. 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 these cases is best practice for transparency and accountability.

Scoring

0	A case has not been disclosed.
1	A case or suspected case has been disclosed, or the company has identified a widespread systemic challenge in a particular sector or geography that it is linked to.

Explanatory notes

- Although we recognise that some companies struggle to find modern slavery, this point cannot be scored without disclosing a case. It is not sufficient to say that there were no instances of modern slavery.
- A suspected case might be identified through the presence of more than one of the International Labour Office's 11 indicators of forced labour.

DSM-Firmenich

3

M&G

Financials

Objective: As part of a wider discussion, to ensure that Dutch health, nutrition, and fragrance and flavourings specialist DSM-Firmenich had adequate policies and procedures in place to address child labour in its supply chain. This followed a BBC investigation into child labour use in the Egyptian jasmine trade, which highlighted Firmenich as a customer of one of the suppliers in question. The story was aired earlier this year, with the investigation taking place in 2023.

Action: M&G met with the company's chief executive and a member of its investor relations team.

Outcome: Through our discussion we ascertained that the company has a strong commitment to ethical sourcing and has implemented various policies and procedures to address issues such as child labour in its supply chain.

M&G, 'Stewardship report 2024'[98]

2

Haleon

Health care

Since 2022, we have focused on our mint supply chain as an area of potential human rights risk given that mint originates from small farms in India. It is recognised that human rights abuses such as child labour, forced labour, poor working conditions and gender inequality are persistent risks in many agricultural supply chains in high-risk locations such as India. As with many smallholder agricultural communities, there is a risk of children being involved in family farm activities. We, therefore, work with our Healthy Mint Supply Chain Programme suppliers, partners, and independent child rights experts to mitigate this risk. This initiative aims to address the root causes of child labour and reduce risks to children living in mint-farming communities.

Haleon, 'Human rights statement 2024: covering modern slavery, decent work, forced labour and child labour'[99]

3

Shell

Energy

In 2024, we investigated and substantiated three reports related to workers in the value chain, arising from both external reports and identification through our procedures. These cases concerned matters including late payment of wages, failure to provide unrestricted access to passports and the requirement to pay recruitment fees.

Shell, 'Annual report and accounts for the year ended December 31, 2024'[100]

Fix it

For this section, all information disclosed by the company in the public domain is eligible for consideration. However, companies must have disclosed a case of modern slavery (question 36) to be eligible to score for questions 38–42. The disclosed case may be in their direct operations, supply chains, service chains and/or downstream value chains.

Question 37

Does the company have a 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

UNGPs

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'.[101] They commit companies to supporting or enabling remedy for human rights abuses.

Scoring

0	There is not a human rights policy explicitly aligned with the UNGPs.
1	There is a human rights policy explicitly aligned with the UNGPs.

Question 38

Where violations were found, in the words of the UN Guiding Principles on Business and Human Rights (UNGPs), had the company disclosed whether it had caused, contributed to or been linked to an adverse human rights impact (modern slavery case)?

Corresponding standards

UNGPs

Rationale

The UNGPs require businesses to disclose how they have been linked to adverse human rights impacts as part of their human rights due diligence. Recognising responsibility for cases of modern slavery is the first step towards meaningful remediation.

Scoring

0	The company has not discussed how its actions caused, contributed to or linked it to a case of modern slavery.
1	The company states that it recognises its responsibility for having caused, contributed to or been linked to a case of modern slavery.

We are committed to proactively avoiding human rights infringements resulting from our business activities. Where we do cause or contribute to adverse human rights impact, we are committed to providing effective remedy.

In 2024, we received 12 reports through our confidential reporting hotline that included potential indicators of modern slavery in our managed hotels. These were mainly related to concerns about excessive overtime and appropriate compensation for hours worked.

For cases that have been substantiated and where we either caused or contributed to an adverse impact, remedial actions included: implementing updated policies and processes, closely monitoring overtime hours and payments and regularly reviewing staffing levels, conducting random spot checks and training for leadership to prevent recurrence.

InterContinental Hotels Group, 'Modern slavery statement 2024'[102]

1

InterContinental Hotels Group

Consumer discretionary

Question 39

Where violations were found, had the company disclosed the steps taken to end and mitigate ongoing risks?

Corresponding standards

UNGPs

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 There is no description of the steps taken to end and mitigate ongoing modern slavery risks.

1 There is brief detail about the steps taken to end and mitigate ongoing modern slavery risks.

2 There is detailed discussion of the steps taken to end and mitigate ongoing modern slavery risks, including at least two of the following: the specific actions taken, the outcomes of the actions, a timeline of the case and how effectiveness was verified.

1

J Sainsbury

Consumer staples

Case study: Supporting the repayment of recruitment fees

In November 2024, our ethical team identified recruitment fees issues through worker interviews at Supplier C. Following further investigation, the supplier identified a total of 13 workers, hired by contractors, who were being charged a monthly recruitment fee.

We worked with Supplier C to develop a repayment plan to reimburse all workers and implement a corrective action plan to ensure that workers are not charged recruitment fees going forwards.

Sainsbury's ensured Supplier C communicated the repayment plan to the impacted workers to make sure they understood the process. In April 2025, we reviewed evidence of bank transfers to workers to verify the reimbursement and also carried out further worker interviews.

J Sainsbury, '2024/25 modern slavery statement'[103]

2

Bunzl

Industrials

One of our operating companies in the Netherlands has a long-term relationship with a supplier based in Taiwan where we identified a forced labour issue in April 2024. Migrant workers were paying recruitment fees for jobs at the company, which is not against local law but is not accepted by Bunzl and the [International Labour Organization]. We explained why this issue is recognised as forced labour and demanded the supplier change their policy, provide training to other members of their team and return all fees previously paid. The supplier remained unapproved until all rectification evidence had been reviewed and approved, which has now been completed.

Bunzl, 'Modern slavery and human trafficking statement 2024'[104]

Question 40

Did the company report outcomes of the remedy process for the victims?

Corresponding standards

KTC 7.2; UNGPRF C2

Rationale

Remediation should be centred on those that have experienced harm and tailored to their needs.

Scoring

0	There is no information about the outcome of remedy for survivors of forced labour and/or the reported actions focus on the company's relationship with its suppliers.
1	The outcomes of the remedy process for survivors of forced labour have been reported.

2

NatWest Group

Financials

In 2024, the [Sexual Exploitation Dashboard] identified key red flags which raised suspicions of a customer's involvement in the provision of sexual services.

The customer was receiving high value credits from multiple third parties, cash deposits, and expenditure such as travel, accommodation, and charges for advertising on adult services websites. Transactional links to the customer identified a male suspected of being involved in sexual exploitation, as well as links to other individuals; Suspicious Activity Reports (SARs) were filed to the National Crime Agency (NCA) …

As a direct result of the SARs, law enforcement commenced an operation into the trafficking of vulnerable females for the purposes of sexual exploitation. To date, four people, who are part of an organised crime group (OCG), have appeared in court charged with a range of offences including human trafficking for sexual exploitation and money laundering. Law enforcement have measures in place for safeguarding the victims.

NatWest Group, '2024 statement of modern slavery and human trafficking'[105]

2

Rentokil Initial

Industrials

During an audit of a new second-tier supplier in Malaysia, it was suspected that their Recruitment Agent was withholding the passports of foreign workers employed in the factory. The issue was raised to the local HR team who investigated and arranged for the passports to be returned to the workers.

Rentokil Initial, 'Modern slavery statement 2024'[106]

Question 41

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

Corresponding standards

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 forced labour.

1 There is evidence that survivors were consulted on remedy and indicated that they were satisfied with the outcome.

1

Unilever

Consumer staples

Since our last Statement, we commissioned Impactt, a human rights consultancy, to verify the remaining payments that were made between July to December 2023. This verification process found that 100% of payments to the 155 eligible current workers had been made.

By the end of 2024, the amount paid since the beginning of this repayment verification project totalled USD 692,514.00. Impactt engaged with workers to understand how the repayment had benefited them. 80% of workers indicated that they found the money helpful and that they would be able to save a little more money monthly, better support their families, repay loans, buy land, build or renovate their own homes or pay for children's school fees. Additionally, 13% used the money for essential monthly expenses such as food.

Unilever, 'Modern slavery statement March 2025'[107]

1

Imperial Brands

Consumer staples

We have engaged nearly 1,000 workers on our commercial farms during the 2024 crop season. We asked for their feedback on the remediation actions implemented since 2023, and they gave a 92% satisfaction rate. We remain committed to continuing to listen, learn, and evaluate the effectiveness of remediation actions to address root causes.

Imperial Brands, 'Modern slavery and human trafficking statement 2024'[108]

Question 42

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

Corresponding standards

S2G 29; IRBC p8

Rationale

Provision of remedy is often challenging because 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 the remedy for the specific people who have experienced forced labour in the cases disclosed.

Scoring

0 There is no information about how the company has tried to increase its leverage and effect systemic change.

1 There is evidence that the company is trying to increase its leverage and effect systemic change through industry collaboration and membership of initiatives working towards modern slavery remediation and prevention.

2 There is evidence that the company 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.

2 £

Barclays

Financials

A public-private partnership project – co-led by the [National Crime Agency] and Barclays and facilitated by the Agency's Joint Money Laundering Intelligence Taskforce (JMLIT) — was launched in January 2024. It is the first of its kind, solely focused on the threat of sexual exploitation in the UK, and brings together subject matter experts from some of the UK's largest financial organisations. The project aims to:

- Improve understanding of the signs of sexual exploitation in financial data, and therefore the detection and reporting of it;
- Identify lines of enquiry in both new and ongoing law enforcement investigations;
- Strengthen the UK financial sector's response to sexual exploitation to better identify victims and offenders.

Barclays, 'Barclays PLC group statement on modern slavery'[109]

1

Unilever

Consumer staples

Using technology to amplify engagement with workers

In July 2023, a collaborative partnership was launched with Coca-Cola, [the International Organisation for Migration], diginex and Unilever, aided by financial support from the Bonsucro Impact Fund. This 18-month project focuses on strengthening human rights due diligence and promoting decent work in Thailand's sugarcane supply chain using new technology and multi-stakeholder engagement. This year the programme has encouraged workers in the sugarcane sector to provide insights into their experiences and day-to-day work life. Diginex is using this information to help build a comprehensive understanding of the challenges workers face. The survey data is also helping to identify how factors such as gender, migration status, and other variables may influence their potential exploitation. Key recommendations are being shared with industry stakeholders to influence policy development. Further updates on this project and its progress will be shared in 2025.

Unilever, 'Modern slavery statement March 2025'[110]

2

International Consolidated Airlines Group

Industrials

[International Consolidated Airlines Group] has been a key partner in developing the joint Guidelines for Combatting Trafficking in Persons in the Air Operator Supply Chain ICAO-OHCHR Circular 362 in partnership with other airlines, regulatory bodies, law enforcement agencies, NGOs and national government agencies. These guidelines were published in April 2025 and work is underway to ensure that our internal policies and procedures are aligned with these new guidelines.

International Consolidated Airlines Group, 'Modern slavery statement'[111]

Prevent it

For this section, all information disclosed by the company in the public domain is eligible for consideration.

Question 43

Did the company have a corrective action process for its suppliers and potential actions taken in case of non-compliance, such as stop work notices, warning letters, supplementary training or policy revision?

Corresponding standards

BHRRC 5.6; KTC 7.1

Rationale

Terminating a supplier relationship over forced labour 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.

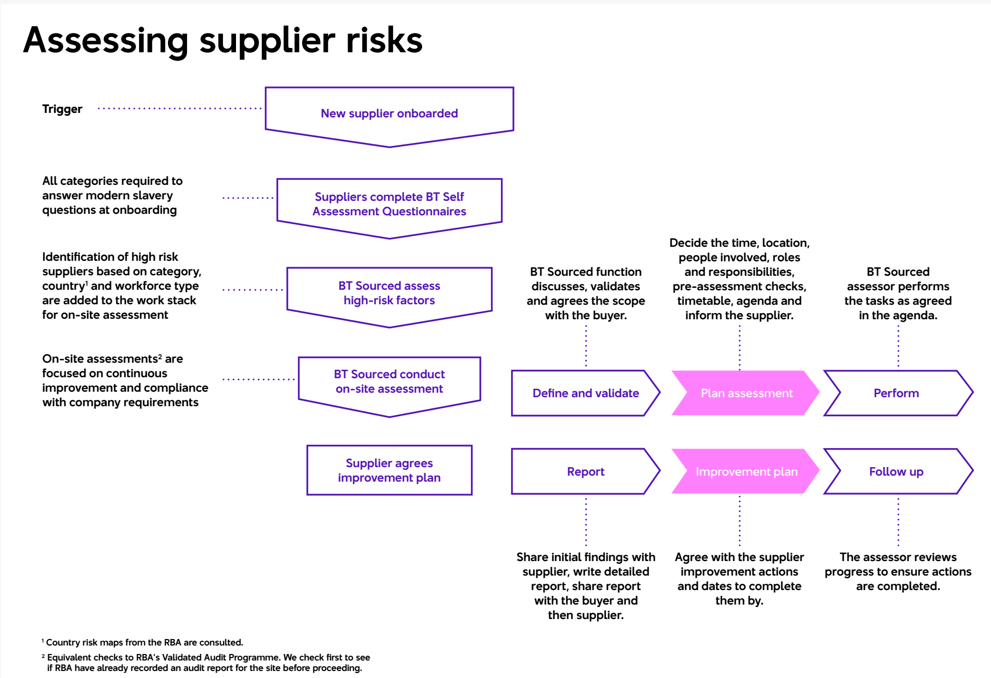
Scoring

Score	Description
0	The company has not disclosed any information on a corrective action process.
1	There is a corrective action process that includes escalation procedures to be followed in the event of a case of modern slavery being identified.

2

BT Group

Communication services



BT Group, 'Fighting modern slavery'[112]

Question 44

Did the company discuss a responsible exit strategy from a supplier relationship?

Corresponding standards

KTC 7.1.3

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 made to ensure workers are not adversely affected by this decision.

Scoring

0	There is no information disclosed on a responsible exit strategy.
1	There is discussion of how the company would exit a supplier relationship in such a way as to mitigate the consequences for workers, and the company demonstrates an understanding that leaving a relationship might put workers at further risk.

3

ITV

Communication services

“”

Where issues are identified with a supplier, it may be necessary for ITV to terminate the engagement and our standard terms include provisions that would allow us to do so. However, we understand that in certain cases termination is likely to exacerbate the risk to already vulnerable workers. In these circumstances we would seek to work with suppliers to deliver compliant practice and use termination as a last resort.

ITV, ‘Modern Slavery Act transparency statement March 2025’[113]

2

JD Sports Fashion

Consumer discretionary

“”

This policy is to ensure we exit a relationship responsibly and minimise the risks posed to those who own and/or are employed by the business. Through transparent communication and business partnering, our aim is to preserve professional and amicable business relationships where possible and maximise the opportunity for the factory to remain a viable and sustainable business after our exit so that workers retain their jobs and their rights …

Transparent communication between both parties is key to this process. It is recommended that should it be decided that a timely exit is decided upon, a meeting is held with the factory management to advise them of the outcome and the exit date.

At the end of the stated period, if it is established that the best option is to exit the relationship, the process will advise the exit date. Considerations will be given to:

- Length of relationship with supplier.
- Percentage overall business with the supplier in specific factory or site.
- Specific violation in serious breach of contract and policy.

Outstanding Payments will be paid immediately on the exit date.

JD Sports Fashion, ‘Responsible exit policy 2022’[114]

Question 45

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

Corresponding standards

KTC 4.2; EPP

Rationale

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. Companies should commit to this principle as a mechanism for responsible recruitment that protects migrant and temporary labour and show how they implement it in their recruitment practices.

Scoring

0	There is not an explicit commitment to the Employer Pays Principle.
1	There is an explicit commitment to the Employer Pays Principle or a statement to this effect.

3.2.4 No employee, including employees of suppliers' sub-contractors, shall pay for the right to work i.e. direct payments to the supplier or any recruitment fees.

3.2.5. Employers must demonstrate evidence that all legitimate fees and any related costs associated with the recruitment of workers are borne by the company and not employees. This includes employees recruited or employed by external agencies or other 3rd parties.

Anglo American, 'Responsible Sourcing Standard for Suppliers 2024'[115]

2

Anglo American

Materials

Question 46

What evidence was there of responsible procurement practices to encourage or reward good labour practices?

Corresponding standards

None

Rationale

Responsible purchasing practices are processes enacted to ensure that a company is not putting suppliers under undue pressure through its commercial practices. Suppliers should be treated with respect and in a fair, reasonable way. Increased pressure on suppliers increases the likelihood that they will use forced labour.

Scoring

0	There is no evidence of responsible procurement practices.
1	There is a policy disclosure that sets out how the company's employees should treat its suppliers with respect and in a fair, reasonable way.
1	There is evidence of responsible procurement practices through either external accreditation or detailed discussion of the mechanisms and schemes implemented.
1	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.

(3 points available)

2

National Grid

Utilities

In the UK, National Grid has committed to pay, as a minimum the real living wage via accreditation with the Living Wage Foundation. For suppliers within existing contracts, we ask for voluntary participation where this is not a contractual requirement… this applies to all contractors over 18 years old who work on behalf of National Grid for two or more hours a week for eight or more consecutive weeks …

National Grid has demonstrated its commitment to the fair treatment of our suppliers by signing up to the Prompt Payment Code. We encourage our suppliers to adopt the principles of this code throughout their own supply chains.

National Grid, 'Supplier code of conduct'[116]

Note: this example is good practice for evidencing responsible purchasing practices (the second point in this non-laddered question).

This year, we have engaged with our supplier partners, becoming participants in Better Buying™ to help us understand how our buying practices impact our business partners.

Marks & Spencer Group, 'ESG report 2025'[117]

Note: this example is best practice for having an anonymous supplier feedback mechanism (the third point in this non-laddered question).

1

Marks & Spencer Group

Consumer staples

Question 47

Was there a board member or board committee tasked with oversight of the company's modern slavery policies?

Corresponding standards

BHRRC 2.2; 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 to enable work throughout the business and to have board members accountable for forced labour.

Scoring

0 There is no disclosure of the board member or committee with oversight of modern slavery policies.

1 There is disclosure of the board or committee responsible for addressing modern slavery and/or broader related business and human rights concerns.

Question 48

Did the company have a committee, team, programme or officer responsible for implementing its modern slavery policies and responding to violations?

Corresponding standards

BHRRC 2.2; 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 the implementation of these policies. This question seeks to understand that a relevant person or team is in place to drive the work forward.

Scoring

0 There is no information on who is responsible for the implementation of the company's modern slavery approach, or authority is delegated to business units with no further detail.

1 There is a team or person who is primarily responsible for actioning the company's modern slavery approach.

2

AstraZeneca

Health care

"In 2024, we reviewed our training strategy and set up a new Modern Slavery Working Group consisting of representation from key functions including Sustainability, Human Resources, Recruitment, Compliance and Procurement. This group meets quarterly to discuss human rights related topics, share knowledge and provide updates as well as actively look for opportunities to spotlight Modern Slavery enterprise wide."

AstraZeneca, 'Modern Slavery Act statement for the year ending 31 December 2024'[118]

Key

BHRRC	Business and Human Rights Resource Centre methodology for assessing transparency in the supply chain (TISC) statements[119]
CSDDD	Corporate Sustainability Due Diligence Directive[120]
CSRD	Corporate Sustainability Reporting Directive[121]
EPP	Employer Pays Principle[122]
ETI	Ethical Trading Initiative's 'Access to remedy' guidance for companies[123]
Home Office guidance 2021	Home Office's 2021 guidance on transparency in supply chains in relation to the Modern Slavery Act[124]
IRBC	Sociaal-Economische Raad's paper on enabling remediation[125]
KTC	The KnowTheChain assessment methodology[126]
S2G	Stronger Together's 'Tackling modern slavery in global supply chains' toolkit[127]
UNGPs	UN Guiding Principles on Business and Human Rights[128]
UNGPRF	UN Guiding Principles Reporting Framework[129]

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Important information

TO FIND OUT MORE

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