

Engagement expectations

Find It, Fix It, Prevent It

An investor project to tackle modern slavery



CCLA

GOOD INVESTMENT

‘If an organisation has properly assessed the nature and extent of its exposure to the risk of modern slavery, it will be more able to take targeted action to find it, to remedy it, and to prevent it occurring in the future.’

Home Office, Transparency in Supply Chains: A Practical Guide, p34

‘Please don’t judge a business on whether modern slavery is present. Judge them by how they respond.’

Shayne Tyler, Fresca Group

‘It is inevitable that the further up supply chains you investigate you are highly likely to find modern slavery there.’

Chief Superintendent Paul Griffiths,
President of the Police Superintendents’ Association

Executive summary

'Find It, Fix It, Prevent It' is an investor-led, multi-stakeholder project designed to harness the power of the investment community to increase the effectiveness of corporate actions against modern slavery. To do so it has three project streams:

1. Public policy engagement – Promoting meaningful regulatory frameworks that tackle modern slavery.
2. Developing better data – Working with environmental, social and governance (ESG) data providers, academics and non-governmental organisations (NGOs) to identify and develop data sources that help investors understand the scale of the issue.
3. Corporate engagement – Dialogues with prioritised companies to help them develop and implement better processes for finding, fixing, and preventing modern slavery.

This document relates to the third of these work streams and sets out what we aim to achieve with companies through engagement. These aims are based on the UN Guiding Principles of Business and Human Rights and draw upon existing best practice principles developed by the likes of the Business and Human Rights Resource Centre and KnowTheChain.

Although the list of indicators is extensive, as we believe modern slavery exists in the supply chain of nearly every business, there are only really four questions that matter to us:

- 'Have you found modern slavery in your operations or supply chain?'
- 'If not, can you demonstrate that you have rigorous processes in place to look for it?'
- 'If so, can you demonstrate the steps you have taken to improve the lives of victims?'
- 'Have you effectively reported your actions and the steps taken to prevent a re-occurrence?'

While the Find It, Fix It, Prevent It engagement coalition will initially use this document in engagement with a specific sector and market, we believe that it is applicable to any company anywhere and we encourage its wide use.

We are grateful to the members of our advisory committee and investor engagement working group who have kindly contributed to the drafting of this work.

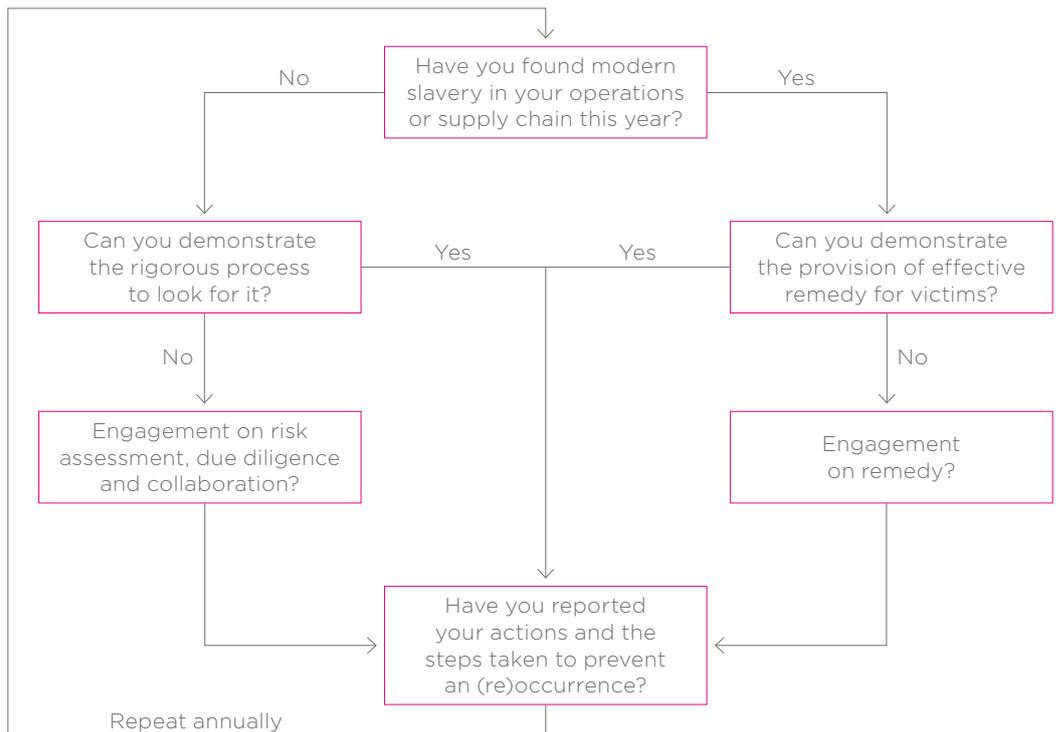
Peter Hugh Smith

Chief Executive, CCLA
Chair of the Find It, Fix It, Prevent It
Advisory Committee

The framework in detail

The Find It, Fix It, Prevent It corporate engagement programme is undertaken through an annual engagement progress. It is delivered as per the diagram below.

Each section of the programme has a number of detailed engagement points. These are disclosed below, with the full rationale and source material included on pages 10-14 of this document.



UNDERSTANDING MODERN SLAVERY

Modern slavery is the process of holding a person in forced service. The UK's Modern Slavery Act (2015) identifies this as being comprised of four related areas: slavery, servitude, forced compulsory labour and human trafficking. This is not limited to the use of physical violence. For example, according to the International Labour Organization (ILO), forced compulsory labour is 'all work or service which is exacted from any person under the threat of a

penalty and for which the person has not offered himself or herself voluntarily.' This includes more subtle means of coercion.

'Various indicators can be used to ascertain when a situation amounts to forced labour, such as restrictions on workers' freedom of movement, withholding of wages or identity documents, physical or sexual violence, threats and intimidation or fraudulent debt from which workers cannot escape.'¹

In 2017, the ILO found that 'most victims of forced labour suffered multiple forms of coercion from employers or recruiters as a way of preventing them from being able to leave the situation.'² Modern slavery is a difficult crime to find and it is therefore helpful to look for indicators that may point to its presence. *ILO Indicators of Forced Labour* is a useful resource identifying these.³

Opening question:

‘Have you found modern slavery in your operations or supply chain this year?’

We believe that modern slavery exists in the supply chain of nearly every company, so our starting point is that companies with good processes and practices should find it. Depending on the company, modern slavery may also exist in its own operations. The annual

time frame corresponds with the UK Modern Slavery Act’s requirement to report ‘the steps the organisation has taken during the financial year’.

The answer to this initial question sets the direction of further engagement activity.

THE UN GUIDING PRINCIPLES

The UN Guiding Principles on Business and Human Rights⁴ establishes a framework for how companies can approach human rights violations. There are three central tenets to the principles: that the state has a duty to protect human rights, including those of workers; that businesses are expected to respect human rights; and that when rights are violated those affected have access to effective remedy. The UNGP emphasise that responsibility for

business is not just for their own staff but also includes direct and indirect suppliers wherever they are located.

This responsibility is not always the same as there are three ways a business might be connected to human rights violations are articulated in the UNGP: cause, contribution and linkage. Where a company causes, or contributes to, a rights violation steps should be taken to mitigate the impact

of this for those concerned. A business might also be connected to an adverse human rights impact via certain business relationships. In these circumstances a business may not be able to mitigate the problems directly but has a responsibility to use its leverage with the other parties involved to enable remedy.

Further details on the UN Guiding Principles are available online.⁵

Find It

‘If you have not found modern slavery, can you demonstrate that you have rigorous processes in place to look for it?’

Although unlikely, there may be some companies where modern slavery doesn't exist in either the operations or supply chains. To be reassured of this we would need to see that sufficient steps have been taken to ensure that the operations and supply chain have been thoroughly explored by, for instance, tracing back through the different tiers of the supply chain to raw materials.

The ‘find it’ questions below detail the evidence that we would like to see.

Find 1

Has the company mapped the extent of its operations and supply chains (including beyond the first tier)?

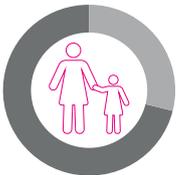
Find 2

Does the company disclose the countries of its tier 1 suppliers (defined as those suppliers with whom the company has a direct contractual relationship)?

Find 3

Does the company disclose the countries of tier 2 and 3 suppliers? From further down the supply chain, does the company identify the main categories of products/services/parts/raw materials that end up in its products, and classify them by sourcing country?

40 MILLION PEOPLE



are victims of modern slavery; women and girls account for 71%

Find 4

Does the company provide information on the workforce in both its operations and supply chain and discuss countries of origin for any migrant workers? Does the company understand and report on how migrant workers are recruited (e.g. where recruitment happens, how high recruitment fees are, other fees that must be paid)?

Find 5

Does the company undertake, and summarise the results of, a risk assessment of modern slavery indicators in its operations and supply chain (both actual and potential risks)? Are the most salient risks identified and disclosed?

Find 6

Does the company provide details of how this risk assessment of its operations and supply chain was carried out including which indicators, resources and tools were used?

Find 7

Does the company seek input from an expert stakeholder(s) (e.g. local NGOs, trade unions) when developing and/or undertaking internal or external assessments, and has the expert has been identified in the statement?

Find 8

Does the company participate in multi-stakeholder collaborations or industry initiatives related to human rights or modern slavery? Does the company provide details of participation and commitments made as part of the multi-stakeholder group rather than just passive membership?

Find 9

Has the company appointed a supply chain auditor (internal or external) who has a track record of finding forced labour and human trafficking? Do they disclose the findings?

Find 10

Do the audit practices include: non-scheduled unannounced visits; a review of relevant documents; off-site interviews with workers; visits to associated production facilities and related worker housing; and steps to ensure that suppliers below the first tier are monitored? How frequent are these audits?

Find 11

Does the company ensure there is a grievance mechanism(s) (its own, third party or shared) available to all workers in its operations and the supply chain to raise human rights related concerns (including labour conditions) without retaliation? Can the company demonstrate how these are used by workers and whether they are trusted by the workers?

Find 12

Has the company received any whistleblower reports of forced labour from activists, trade unions, members of the public or others? If so, how many? Does the company provide detail of the allegation and the actions the company has taken in each case?

Fix It

'If you have found modern slavery, can you demonstrate the steps you have taken to improve the lives of victims?'

Once modern slavery is found it is imperative that companies respond appropriately and in a timely manner. A principle of our engagement is that we won't blame companies for discovering problems in their supply chain – in fact we actively encourage and support them to do so. Our support is tested when a company does not respond appropriately to such a discovery.

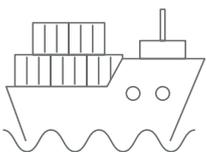
The Ethical Trading Initiative, drawing on the UN Guiding Principle framework, provides a succinct definition of remedy and ways it can be sought: 'When a brand or retailer's operations have caused or contributed to human rights abuses, however unintentionally, the company is responsible for immediately providing or contributing to remedy.'

How a company responds will depend on how a company is connected to forced labour when it is found. We

expect that most instances of forced labour and human trafficking found by investee companies will be in the supply chain, where the business relationship implies a linkage. In such situations, the UNGPs state that 'Where linkage exists, the business should use its leverage (and build additional leverage where needed) to seek to influence the behaviours and actions of other actors playing a role in the impact taking place, in order to prevent or mitigate the impact from occurring, continuing or recurring.'⁶

In all cases remedy should be in consultation with the worker(s) affected and promote their wellbeing, bearing in mind that exploited people may have been forced to break the law themselves. Our expectation is for companies to focus on ensuring that remedy, however it is provided, is appropriate to the situation and in the interests of those who are the victims of exploitation.

\$18 BILLION



the value of goods imported into the UK each year that are likely to have used slave labour in their production

PROMOTING EFFECTIVE COLLABORATION AND IMPROVING LEVERAGE

Companies may find it difficult to achieve some elements of the framework on their own and it may be necessary to work with peer group companies in collaboration. Shared experience will help identify problems; groups of companies that share a supplier may have more effective communication together; and collective lobbying of governments for new and better enforced labour regulations is also more likely to be productive. For this reason, the Find It, Fix It,

Prevent It initiative seeks to promote meaningful, action orientated sector partnerships. These groups allow individual companies to increase and use their leverage more effectively.

Examples of collaborating to improve leverage include:

- ‘Company A’ creating a coalition of five buying companies that share a common supplier working with Impactt, an ethical

trade consultancy, to provide remediation to migrant workers who had paid large recruitment fees.⁷

- Members of the Ethical Trading Initiative that source seafood from Thailand collectively lobbying the Thai Government to continue landmark labour reforms.⁸
- The Finance Against Slavery and Trafficking Initiative mapping how leverage is being used in different ways by various actors in the finance industry.⁹

Fix 1

How many cases of modern slavery have been identified? Does the company disclose how these were found?

Fix 2

Has the company used the UN Guiding Principles to establish its position with relation to the violations? (i.e. have/are they caused, contributed to, linked to the poor practices?)

Fix 3

Where there are ongoing violations, has the company disclosed the steps taken to end those and mitigate ongoing risks?

Fix 4

Has the company engaged in, or facilitated, meaningful dialogue with the stakeholders affected?

Fix 5

What form does remedy take in each case? Has the company reported the outcomes of the remedy process for the victims?

Fix 6

Has the company provided evidence that the remedy(ies) are satisfactory to the victims or groups representing the victims and that victims are being supported? Has this been tracked over time?

Fix 7

Has the company demonstrated a means to verify remediation, such as record review, employee interviews, or spot-checks?

Fix 8

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

Fix 9

Has the company worked with others, combining their leverage, to support system-level action?

Prevent It

‘Have you effectively reported your actions and the steps taken to prevent instances of modern slavery occurring in your operations and supply chain?’

As well as taking steps to support remedy for individuals affected by rights breaches, a company that finds evidence of poor practice should also be taking steps to mitigate the risks of this reoccurring in the future both in that location but also elsewhere in their operations and supply chain. The solution is rarely for the company to immediately distance themselves from a supplier as this will not improve the situation for future workers. Rather a company should often seek to work with suppliers to help them to improve. This may not be possible where the crimes are particularly egregious or systemic in nature and there is little chance that sustained engagement will see improvements.

The ‘prevent it’ questions in the framework also ask how the information learned from uncovering instances of modern slavery is feeding into a company’s policies and practices on addressing modern slavery. A key aspect here is for companies to work towards empowering workers to understand and enforce their labour rights. This could be achieved by implementing effective grievance mechanisms that allow workers to report issues before they escalate. It also includes ensuring unionisation or other means of worker engagement such as regular worker committees and implementing enforceable supply chain labour rights agreements. Another important aspect is looking at a company’s purchasing practices. Low prices and quick turnaround times often have a direct impact on working conditions.

ANNUAL ACTION AND REPORTING

We believe that detailed reporting is the only method for communicating the effectiveness of corporate attempts to fight modern slavery. The central tenet of section 54 of the UK’s Modern Slavery Act is that companies should report annually on the actions they have taken *in that year*, and outline time-bound targets they aim to take in the next year(s). All of the steps covered by this engagement

framework should be publicly reported in modern slavery statements or, if not operating in the UK, other forms of public document. It is not possible for companies to eradicate modern slavery in their supply chains in one year. As such we invite them to continue the process we have set out – continuing year on year to identify and rectify examples of modern slavery within their supply chain.

Prevent 1

Has the company disclosed a corrective action process for the violation and potential actions taken in case of non-compliance, such as stop-work notices, warning letters, supplementary training, and policy revision?

Prevent 2

Has the company demonstrated a means to verify implementation of corrective actions, such as record review, employee interviews, or spot-checks?

Prevent 3

Is exit from a supplier relationship only considered in either: the most egregious cases where engagement will not have an impact; or after strong and persistent engagement, training, and steps to improve outcomes for workers?

Prevent 4

Has the company taken steps to ensure any learning from instances of modern slavery found is being applied and shared in other parts of the company's operations and supply chain?

Prevent 5

Have grievance mechanisms been evaluated and improved in response to problems being found?

Prevent 6

Have the steps above been taken in collaboration with other companies, associations, trade unions and NGOs? Does the company provide details of this collaboration?

Prevent 7

Has the company integrated the Employer Pays Principle into its recruitment practices? What specific changes have been made?

Prevent 8

Purchasing practices: How does the company work to adopt strong planning and forecasting processes with suppliers as well as ensure prompt payment to them? What procurement incentives does the company provide to suppliers to encourage or reward good labour practices (such as price premiums, increased orders, and longer-term contracts)? Does the company work to avoid late changes to orders and unrealistic timelines?

Prevent 9

Governance: Does the company have a committee, team, program, or officer responsible for the implementation of its modern slavery policies and responding to violations? Is there a board member or board committee tasked with oversight of its modern slavery policies (including in its supply chains)?

TO END MODERN SLAVERY BY 2030

10,000 people would need to be freed every day

Detailed engagement indicators

Find It

QUESTION	EXPLANATION	REFERENCES
Does the company have rigorous processes in place to look for modern slavery in its operations or supply chain?	To find instances of modern slavery a company will need good risk assessment processes and due diligence of suppliers. As modern slavery is difficult to identify it can be helpful to look for some of the indicators of the different crimes the definition of modern slavery covers. For example, the guidance of the ILO is that forced labour is 'work that is performed involuntarily and under the menace of any penalty' including violence and intimidation along with more subtle forms of coercion such as retention of identity documents or high levels of debt.	ILO definition
1 Has the company mapped the extent of its operations and supply chains (including beyond the first tier)?	These questions allow a company to demonstrate that it has assessed and understands its supply chain. Public information allows external stakeholders to understand possible risks in the supply chain too.	BHRRC 4.3
2 Does the company disclose the countries of its tier 1 suppliers (defined as those suppliers with whom the company has a direct contractual relationship)?		BHRRC 1.5; KTC 2.1
3 Does the company disclose the countries of tier 2 and 3 suppliers? From further down the supply chain does the company identify the main categories of products/services/parts/raw materials that end up in its products, and classify them by sourcing country?		BHRRC 1.6; KTC 2.1
4 Does the company provide information on the workforce in both its operations and supply chain and discuss countries of origin for any migrant workers? Does the company understand and report on how migrant workers are recruited (e.g. where recruitment happens, how high recruitment fees are, other fees that must be paid)?		KTC 2.1
5 Does the company undertake, and summarise the results of, a risk assessment of modern slavery indicators in its operations and supply chain (both actual and potential risks)? Are the most salient risks identified and disclosed?	Assessing risk, particularly when drawing on expert knowledge, allows a company to identify areas in the supply chain that may require enhanced scrutiny and mitigation. The most salient risks - those where impact is greatest and most likely - should be prioritised.	BHRRC 4.1, 4.4, 4.8, 4.9; KTC 2.2; UNGPRF B1; S2G 17
6 Does the company provide details of how the risk assessment of its operations and supply chain was carried out including which indicators, resources, tools were used?	As per the UNGP 'risk' is always considered as the risk to workers in the supply chain rather than risk to the business.	BHRRC 4.2, 4.5, 4.6; KTC 2.2; UNGPRF B2; S2G 19
7 Does the company seek input from an expert stakeholder(s) (e.g. local NGOs, trade unions) when developing and/or undertaking internal or external assessments, and has an expert been identified in the statement?		BHRRC 4.7; KTC 1.5; S2G 20;

Find It

QUESTION	EXPLANATION	REFERENCES
8 Does the company participate in multi-stakeholder collaborations or industry initiatives related to human rights or modern slavery? Does the company provide details of participation and commitments made as part of the multi-stakeholder group rather than just passive membership?	Collaborative action is beneficial in all areas of this framework. Companies may share suppliers so pooling information is helpful.	BHRRRC 3.6; KTC 1.5
9 Has the company appointed a supply chain auditor (internal or external) who has a track record of finding forced labour and human trafficking? Do they disclose the findings?	Supply chain audits are a much-used monitoring tool. However, 'numerous reports have found [social audit] to be ineffective in capturing human rights abuses in global supply chains'. ¹⁰ Audit can still be a useful tool in monitoring supply chains but needs to be done well, by those who have a track record of identifying problems in their reports, and needs to be complemented by other approaches.	BHRRRC 3.4, KTC 6.2.4 (modified)
10 Do the audit practices include: non-scheduled unannounced visits; a review of relevant documents; off-site interviews with workers; visits to associated production facilities and related worker housing; and steps to ensure that suppliers below the first tier are monitored? How frequent are these audits?		KTC 6.1
11 Does the company ensure there is a grievance mechanism(s) (its own, third party or shared) available to all workers in its operations and the supply chain to raise human rights related concerns (including labour conditions) without retaliation? Can the company demonstrate how these are used by workers and whether they are trusted by the workers?	Grievance mechanisms, when operating sensitively and effectively, allow a company to be made aware of problems that workers in the supply chain face. They are a useful tool in helping companies find problems and then provide a process by which remediation is provided and preventative steps can be taken.	BHRRRC 3.8; S2G 35; KTC 5.3; cf ETI.
12 Has the company received any whistle-blower reports of forced labour, from activists, trade unions, members of the public or others? If so, how many? Does the company provide detail of the allegation and the actions the company has taken in each case?		

Fix It

QUESTION	EXPLANATION	REFERENCES
Where instances of modern slavery in company operations or supply chain have been found, can the company demonstrate what steps have been taken to improve the lives of victims?	We expect that remedy is provided when human rights are violated. We recognise that remedy may look different in each case. One reason for this is that direct provision of remedy will be appropriate where there is causation or contribution by the company and using leverage to enable remedy may be more appropriate where there is only linkage. Other details about the specific situation will influence what remedy looks like to the victims.	UNGP
1 How many cases of modern slavery have been identified? Does the company disclose how these were found?		
2 Has the company utilised the UN Guiding Principles framework to establish its position with relation to the violations? (i.e. have/are they caused, contributed to, linked to the poor practices?)	The appropriate role and responsibility for remedy will depend on the way a business is connected to the impact.	UNGP
3 Where there are ongoing violations, has the company disclosed the steps taken to end those and mitigate ongoing risks?	If there are ongoing violations, it's crucial to end those and mitigate risks before we get to the question of remedying harms caused by past shortcomings.	UNGP
4 Has the company engaged in, or facilitated, meaningful dialogue with the stakeholders affected?	Remedy should be focused on those affected.	KTC 7.2; UNGPRF C2
5 What form does remedy take in each case? Has the company reported outcomes of the remedy process for the victims?		KTC 7.2
6 Has the company provided evidence that remedy(ies) are satisfactory to the victims or groups representing the victims and that victims are being supported? Has this been tracked over time?		KTC 7.2; UNGPRF C6
7 Has the company demonstrated a means to verify remediation, such as record review, employee interviews, or spot-checks?		BHRC 3.11; KTC 7.1; UNGPRF C5
8 Where provision of remedy has not been possible, does the company demonstrate how it has tried to use and increase its leverage with other responsible parties to enable remedy to take place?	A business that is linked to modern slavery but cannot provide remedy directly should use its leverage to enable remedy. 'Leverage is about creativity, encapsulating all of the tools that could influence others to change harmful, or risky practices or behaviours'. ¹¹	S2G 29; IRBC p8
9 Has the company worked with others, combining their leverage, to support system-level action?	Collaboration is key. Companies and their suppliers are often operating within wider systems that foster conditions which allow exploitation to occur. Many of the solutions to these problems are not at the individual company level, but companies can contribute to supportive solutions and lobby others to do so too.	

Prevent It

QUESTION	EXPLANATION	REFERENCES
Where instances of poor practice in company operations or supply chain have been found, can the company demonstrate that actions and steps have been taken to prevent instances of modern slavery occurring in your operations and supply chain?	Beyond remedy for those impacted by modern slavery, we want to see how a company is preventing that situation recurring and how learning is applied to other areas of the supply chain.	
1 Has the company disclosed 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, and policy revision?	The company should work with its suppliers to ensure problems found are corrected so that others aren't affected in the future.	BHRC 5.6; KTC 7.1
2 Has the company demonstrated a means to verify implementation of corrective actions, such as record review, employee interviews, or spot-checks?		BHRC 3.11; KTC 7.1
3 Is exit from a supplier relationship only considered in either: the most egregious cases where engagement will not have an impact; or after strong and persistent engagement, training, and steps to improve outcomes for workers?	Assessment should be based on the gravity, scope and severity of the violation. The ability of the company to apply leverage to the situation should also be considered.	KTC 7.1.3
4 Has the company taken steps to ensure any learning from instances of modern slavery found is being applied and shared in other parts of the company's operations and supply chain?	There should be a feedback loop in place so that problems that are found in supply chains inform the company's policies and practices. For example, companies can assist suppliers through efforts to build capacity by providing training to them; procurement practices such as prices and lead times can be reviewed; the ability for companies to hear from workers can be evaluated and improved.	KTC 5.3
5 Have grievance mechanisms been evaluated and improved in response to problems being found?		
6 Have the steps above been taken in collaboration with other companies, associations, trade unions and NGOs?	Does the company provide details of this collaboration?	S2G 29
7 Has the company integrated the Employer Pays Principle into its recruitment practices? What specific changes have been made?	The Employer Pays Principle seeks to eradicate debt bondage by ensuring that no employee pays for a job. This is one of the primary ways in which workers end up in conditions of forced labour. Where fees are being paid companies should work with suppliers to end this practice, noting that often recruiters utilise a network of agents and sub-agents who can be responsible for the charging of fees.	KTC 4.2; EPP
8 Purchasing practices: How does the company work to adopt strong planning and forecasting processes with suppliers as well as ensure prompt payment to them? What procurement incentives does the company provide to suppliers to encourage or reward good labour practices (such as price premiums, increased orders, and longer-term contracts)? Does the company work to avoid late changes to orders and unrealistic timelines?	A supplier that must meet a tight deadline is more likely to rely on temporary sources of labour or sub-contracting in order to meet these. These practices can increase the risk of exploitation. Longer term supportive relationships with suppliers facilitate good communication to address risks together.	KTC 3.1
9 Governance: Does the company have a committee, team, program or officer responsible for the implementation of its modern slavery policies and responding to violations? Is there a board member or board committee tasked with oversight of its modern slavery policies (including in its supply chains)?	Companies that have clearly defined responsibility for modern slavery along with board or executive level oversight will be better able to find, fix and prevent modern slavery.	BHRC 2.2; KTC 1.3; ETI; S2G

Key

BHRRC	Business and Human Rights Resource Centre methodology for assessing Transparency in the Supply Chain (TISC) statements ¹²
ETI	Ethical Trading Initiative, 'Access to Remedy: Practical Guidance for Companies' ¹³
ILO	International Labour Organisation Definition of forced labour ¹⁴
IRBC	International Responsible Business Conduct paper on enabling remediation ¹⁵
KTC	KnowTheChain assessment methodology ¹⁶
S2G	Stronger2gether, 'Tackling Modern Slavery in Global Supply Chains: A Toolkit for Business' ¹⁷
UNGP	United Nations Guiding Principles ¹⁸
UNGPRF	United Nations Guiding Principles Reporting Framework ¹⁹

Featured statistics

Page 4:	40 million people. International Labour Organization and Walk Free Foundation (2017), 'Global Estimates of Modern Slavery: Forced Labour and Forced Marriage', Geneva: International Labour Office, p. 5. Available online at https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf
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Endnotes

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