SECTION A: GOVERNANCE & POLICY

1. Responsibility

Has our organisation established responsibility for managing modern slavery risks and implementing policies at:

a. The Board level?
b. The operational level (e.g. to a working group or lead officer)?

2. Strategy

Does our organisation have a strategy for managing modern slavery risks that has been approved by the Board?

3. Policy Commitment

Do we have policies* that set out our commitment to addressing modern slavery that have been:

a. Approved by the Board?
b. Made public?

*Modern slavery specific commitments may be included within a separate policy or code such as a Human Rights Policy or Supplier Code of Conduct, for example.

4. Policy Implementation

Are our modern slavery specific policies and commitments:

a. Communicated to key stakeholders?
b. Embedded throughout relevant operational procedures?
c. Integrated into contractual provisions?
c. Incorporated into company training?

5. Reporting

Do we report on any breaches of our policies, including modern slavery risks/incidents and our response:

a. Internally to the executive and Board?
b. Publicly in our sustainability or other reports?

SECTION B: RISK ASSESSMENT & DUE DILIGENCE

6. Risk Assessment

Where have we mapped, assessed and prioritised risks of modern slavery and related exploitation in our operations and value chain?

a. Our own operations/employees.
b. Our direct suppliers (Tier 1).
c. Beyond Tier 1 suppliers, including some of our raw materials and other business relationships (e.g. our customers).
7. Our Employment Practices

Have we assessed whether our own organisation’s employment practices are fair and working conditions are decent?

a. Are workers paid a living wage?*

b. Are workers paid their wages and other benefits on time?

c. Are workers required to work excessive overtime?

d. Do workers pay recruitment fees or other fees to get the job?

e. Are workers in situations of debt bondage?

f. Do workers have safe and sanitary working and living conditions?

g. Do workers have contracts in a language they understand?

h. Do workers have access to passport/ID documents at all times?

i. Are workers free to leave their employment or accommodation at all times?

j. Do we ensure workers’ interests are adequately represented, including by respecting worker rights to join trade unions or workers associations?

k. Are all workers’ ages checked and child labour prevented?

l. Does discrimination occur in the workplace?

*A living wage is remuneration sufficient to afford a decent standard of living for the worker and his or her family. Elements of a decent standard of living include food, water, housing, education, health care, transportation, clothing, and other essential needs including provision for unexpected events.

8. Supplier Engagement and Due Diligence

How do we conduct due diligence on our suppliers or other business relationships to assess their modern slavery risks?

a. We ask questions about their workforce, worksites, labour practices, policies and processes for preventing forced and child labour (e.g. through a Self-Assessment Questionnaire).

b. We visit the supplier’s site or facilities or conduct a social audit.

c. We engage with their workers through surveys, interviews, or other technology such as mobile phone apps.

d. We use other risk assessment tools (e.g. traceability and risk mapping tools).

e. We engage with a civil society organisation(s) to support our understanding of risks.

Supplier Transparency: Does our organisation publish its list of suppliers?

9. Purchasing Practices

Have we considered how our purchasing practices (including contract pricing, forecasts, and supplier incentives) might increase risks to our suppliers’ workers?

SECTION C: GRIEVANCE MECHANISMS, RESPONSE & REMEDIATION

10. Grievance mechanisms

How can our employees or workers in our supply chain or other stakeholders raise complaints/grievances?
a. We have a complaints process/grievance mechanism that can be used by our own employees.
b. We have a complaints process/grievance mechanism that can be used by external parties such as suppliers, our suppliers’ workforce and communities affected by our business activities.
c. We require that our key suppliers have grievance mechanisms and share details of grievances relating to our business.

11. Response and Remediation

a. Do we have a documented process that describes our responsibility to remediate harm that we have caused, contributed to or are directly linked to through our business activities?

b. Does it set out steps to investigate and remediate a critical policy breach or a modern slavery incident?

c. Have our processes enabled us to identify and remediate (or cooperate in the remediation of) incidents of modern slavery or related exploitation?