

## 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?
- d. 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?