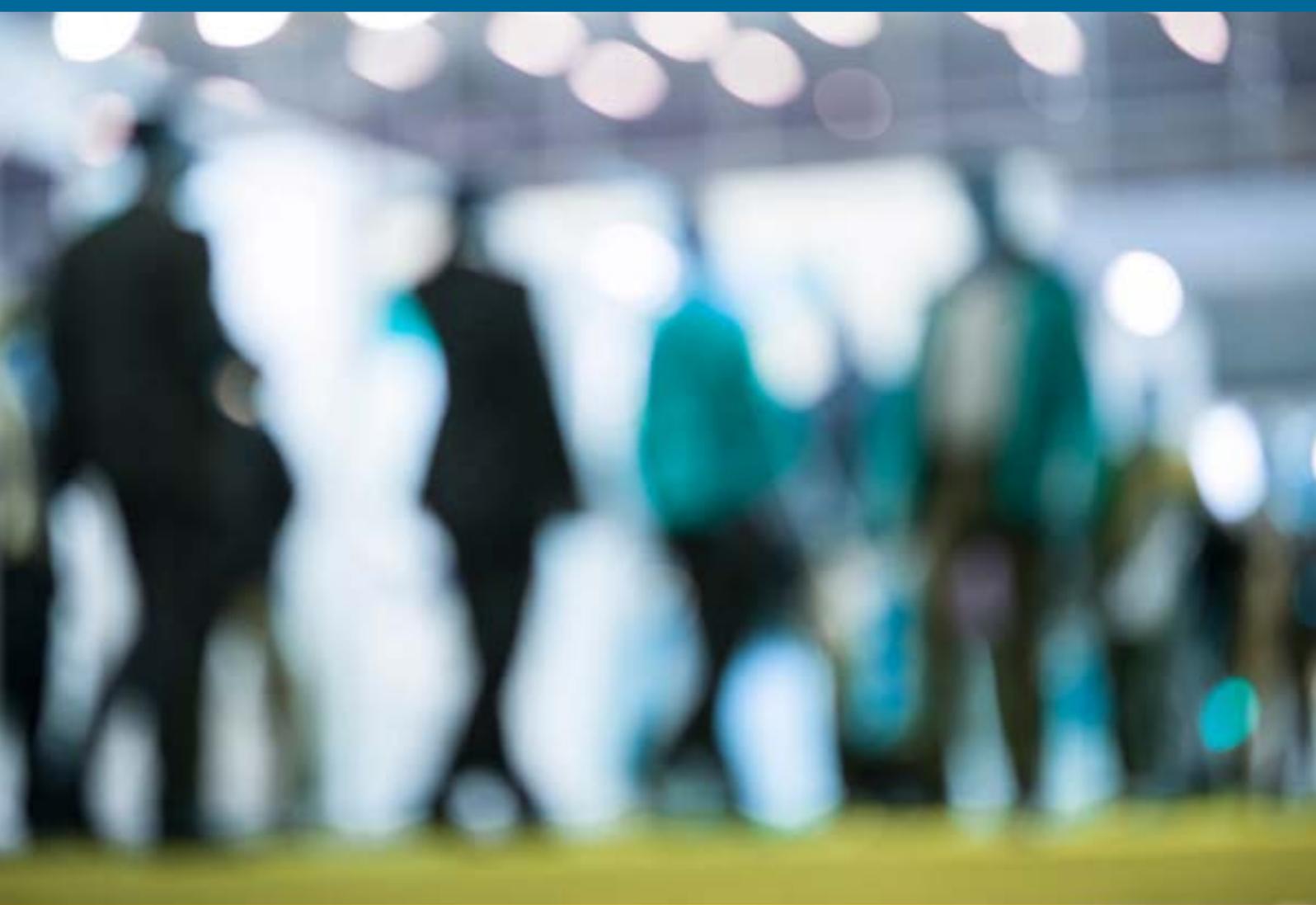


RISK AVERSE?

Company reporting on raw material and sector-specific risks under the Transparency in Supply Chains clause in the UK Modern Slavery Act 2015



ABOUT CORE

CORE is the UK civil society coalition on corporate accountability. We aim to advance the protection of human rights with regard to UK companies' global operations, by promoting a stronger regulatory framework, higher standards of conduct, compliance with the law, and improved access to remedy for people harmed by UK-linked business activities.

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EXECUTIVE SUMMARY

Background

Section 54 of the Modern Slavery Act 2015, the Transparency in Supply Chains Reporting clause requires all commercial organisations with an annual turnover of more than £36 million operating in the UK to publish a Slavery and Human Trafficking Statement. Section 54(5) of the Act describes the information that may be included in a statement:

- the organisation's structure, its business and its supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
- the training and capacity building about slavery and human trafficking available to its staff.¹

The reporting requirement commenced on 29th October 2015 and it is estimated that between 12,000 and 17,000 companies are within its scope. The Home Office recommends that companies report within six months of their financial year end and as businesses with a year end of 31 March 2016 were the first in line to comply, accordingly all companies covered by the requirement should have reported by the end of September 2017. At the time of writing, just over 3,000 statements were available on the Modern Slavery Registry website.

The report

The objective of this report is to provide a snapshot of company Slavery and Human Trafficking Statements published in compliance with the TISC clause. We chose to focus on companies that produce or provide products and services which reach a large number of customers and/or other businesses, and to complement the Business & Human Rights Resource Centre's analysis of FTSE 100 statements by looking at smaller companies, those listed on other exchanges and private firms.

The report's focus is companies who source raw materials associated with a heightened risk of modern slavery - cocoa from West Africa, mined gold, mica from India, palm oil from Indonesia, and tea from Assam - and companies operating in sectors that are widely recognized as being at heightened risk: garment production; hotels and accommodation; construction; football clubs (which due to the nature of their businesses include a wide range of functions including hospitality and retailing manufactured goods); and outsourcing companies. We look at 50 companies' Slavery and Human Trafficking statements; 25 from companies sourcing raw materials, five each under each material; 25 from at-risk sectors, five from each sector.

| Material / sector | Companies included in the report |
|---|---|
| Cocoa from West Africa | Ferrero UK; Hershey ; Lindt & Sprüngli; Mars; Mondelez |
| Mined gold | Cartier (Richemont); Goldsmiths (Aurum Group); Pandora ; Signet; Tiffany |
| Mica from India | Boots (Walgreen Boots Alliance); Dior / LVMH; Estée Lauder; L'Oréal; Revlon |
| Palm oil from Indonesia | Colgate Palmolive; Kellogg; Nestlé UK; Procter & Gamble; Reckitt Benckiser |
| Tea from Assam | Bettys & Taylors; Fortnum & Mason; Tetley (Tata Global Beverages); Typhoo; Unilever |
| Premier League Football Clubs | Arsenal FC; Chelsea FC; Liverpool FC; Manchester City FC; Manchester United FC |
| Apparel & footwear retailers | Aldi UK; Foot Locker; Lidl UK; Matalan; Sports Direct |
| Hotels & accommodation | Airbnb; Hilton; Hyatt; InterContinental; Marriott |
| Housebuilders | Barratt; Bellway; Berkeley; Bovis; Unite Students |
| Outsourcing firms | G4S; Interserve; Mitie; Serco; Sodexo |

We explore if and how companies include information on the particular raw material and sector-specific risks in their statements, looking particularly at the description of their operations and supply chains and their due diligence. These areas correspond broadly with points (a), (c) and (d) of s54(5) of the Act. We also looked for relevant information in other documents available on the companies' websites, for instance Codes of Conduct. We were interested in the extent to which companies are making connections between the risk of slavery and human trafficking, wider labour rights issues (such as wages and working hours) and economic factors, most notably the price paid for raw materials.

The report itself does not allege directly that any of the named companies have slavery or human trafficking in their operations or supply chains. Where references are made to previously published materials making such allegations, we provide a link to the company response, where available.

Summary of findings

| | Statements published | Statements signed by a Director / equivalent | Statements signed on behalf of the board | Statements referring to specific risks of modern slavery in supply chain / sector | Companies publishing relevant information elsewhere on their websites |
|-------------------------------|----------------------|--|--|---|---|
| Cocoa from West Africa | **** | **** | *** | ** | ***** |
| Gold | ***** | *** | * | None | **** |
| Mica | **** | **** | *** | None | ** |
| Palm oil | ***** | ***** | * | ** | ***** |
| Tea from Assam | **** | **** | ** | * | **** |
| Premier League Football Clubs | ***** | **** | **** | None | None found |
| Apparel & Footwear retailers | **** | **** | *** | ** | *** |
| Hotels & accommodation | **** | **** | ** | * | ***** |
| Housebuilders | ***** | **** | ** | *** | *** |
| Outsourcing firms | ***** | ***** | **** | ***** | ***** |

At the time of writing we had found 45 stand-alone Slavery and Human Trafficking statements out of the 50 companies covered in the report.² 20 of the 45 statements are not signed in accordance with the legislation (by a director and on behalf of the board). Almost two-thirds of the 45 statements do not make reference to specific risks of slavery and human trafficking in the relevant raw material supply chain or specific sector. At the same time, most of the 50 companies did make references (ranging from oblique to detailed) in other published materials to supply chain and sector-specific risks. This information ranged from vague references to 'issues' in the supply chain, to detailed information on source countries for commodities.

Acknowledging and understanding the potential risks of modern slavery is crucial: if business do not identify their risks, they cannot begin to take effective action to address those risks. It is essential for peer learning that companies continue to report on risks in their Slavery and Human Trafficking statements even if they are confident that the systems designed to minimise those risks are effective.

While we found that several companies are beginning to integrate their approach to addressing the risks of slavery and human trafficking in the context of wider human rights and labour rights risks, few are making the link to risks that can be generated by their own business models, such as the price paid for an agricultural / mined product or the low wages that characterise certain sectors.

Reporting on due diligence was limited, with many companies indicating continued heavy reliance on audits (usually carried out by a third party, or even by the supplier itself) and

certification schemes. While there is a place for these approaches, they cannot substitute for comprehensive due diligence, undertaken in the spirit of identifying human rights risks based on engagement with workers and producers. Where impact assessments were mentioned in company reports, it was not always apparent that such engagement had been carried out.

Headline findings relating to Slavery and Human Trafficking Statements:

- Of the cocoa companies, only Mars specifically acknowledges that severe human rights risks including forced labour may be present in the cocoa supply chain. Hershey expresses its commitment to eliminating 'illegal and forced child labour' from its supply chain, but it does not provide information on its supply chain or source countries, and neither do Ferrero and Lindt & Sprüngli, in spite of all three companies acknowledging in other publicly available documents that they source from West Africa. Mondelez has not published a stand-alone statement. Mars and Mondelez both refer to declining farmer incomes as an issue in the cocoa supply chain, but there is no substantive discussion of price issues.
- None of the jewellery companies provide any substantive information in their statements on their supply chains and the risks of slavery and trafficking associated with gold mining, even though risks to human rights related to gold sourcing are mentioned in other documents. All companies appear to rely on certification schemes and audit to assess supply chain risk. There is limited discussion of due diligence.
- A number of the cosmetics companies are members of the Responsible Mica Initiative, a multi-stakeholder effort intended to address issues in the mica supply chain. In spite of this, none of the companies provide any substantive information in their statements on their supply chains and the risks of slavery and trafficking associated with mica from India. We could not find a statement from Dior / LVMH.
- All five companies featured in the palm oil chapter have published statements. Kellogg and Procter & Gamble do not mention raw material sourcing. Colgate reports on the scale of its business and provides a link to its policy on palm oil sourcing. Nestlé reports on the scale of its raw materials sourcing and lists palm as one of 12 priority categories for its responsible sourcing activities. Reckitt Benckiser's statement includes a case study on its efforts to improve palm oil traceability, but general information on its supply chain is not provided.
- The only tea company to specifically reference sourcing risks related to Assam in its statement is Bettys & Taylors. Of the other three companies that have published statements, two do not go beyond making general references to human rights issues and conditions on tea estates. Unilever's 2015 Human Rights Report notes low minimum wages as an issue in many tea producing companies, but does not reference Assam specifically. We could not find a statement from Fortnum & Mason.
- Of the apparel and footwear retailers, Aldi and Matalan briefly describe their supply chains and Aldi provides information on identified risks. Lidl has published a list of tier-one production facilities for all its own-brand textiles and footwear and provides information on its due diligence processes. Sports Direct's statement gives no substantive detail on the

supply chain or the company's own operations, and no information on identified risks. We could not find a statement from Foot Locker.

- None of the football clubs provide any information on identified risks, although all five have published statements.
- The four hotel companies provide an overview of the scale of their operations but only Intercontinental provides any information on its supply chain and is the only one of the four to provide details on identified risks. We could not find a statement from Airbnb. There is little discussion of labour conditions in hotel operations and in other published documents, Hilton and Hyatt describe collective bargaining agreements as a risk to their business.
- Three housebuilding companies (Barratt, Bovis and Unite Students) acknowledge specific risks to the sector and their businesses. All five have published statements.
- All five outsourcing companies report on identified risks, mostly (but not exclusively) identifying their supply chains as the main area of risk, rather than their own operations.

Conclusions

As the deadline approaches for companies to publish transparency statements under the Modern Slavery Act, overall compliance with the reporting requirement is low, with an estimated 9,000-14,000 companies still to publish.

This report explores a very small sample (less than 2 per cent) of published statements from larger, well-known companies. In general, we find that many of these statements are not compliant with the basic requirements of the legislation and that the majority do not address in substantive detail the six topic areas listed in the Act. This is despite the fact that relevant information, relating for instance to source countries for raw materials is often provided in other documents available on company websites. Many companies are not reporting on human rights due diligence and are not considering how their own business models can create risks of severe labour rights abuses.

The Modern Slavery Act has been described as a potential game-changer on supply chain transparency, but this will only be achieved with a considered and concerted effort across the private sector. As we move into the next year of reporting, companies have an opportunity to be open about the issues, to learn from good practice and to work together to drive real change.

RECOMMENDATIONS

To the UK Government and other Governments considering the introduction of supply chain reporting requirements:

- Raise awareness among companies of the requirement, particularly companies at the lower end of the reporting threshold.
- Publish a list of commercial organisations that are required to report under the legislation.
- Remove / do not provide an option for companies to report that they have taken no action.
- Provide a means for interested parties to alert an enforcement agency to non-compliance with the reporting requirement, and sanction companies that fail to comply.
- Explore ways to enable discussion between governments, producers, buyers, civil society and certification agencies involved in particular sectors / commodity supply chains, of solutions to systemic drivers of labour rights abuses including price and wages.
- Consider the introduction of so-called 'hot goods' provisions, to prevent the movement of goods suspected of being produced using forced labour; and measures to hold companies to account for failing to prevent slavery and human trafficking in their supply chains, with a means for victims to seek compensation through the courts.

To the UK Government:

- Conduct a substantive revision of the Home Office guidance on the TISC clause, seeking input from expert external stakeholders including trade unions and NGOs.
- Require companies to report on all six areas listed in s.54(5) of the Act.

To other Governments considering the introduction of supply chain reporting requirements:

- Seek to broadly align with existing standards without replicating identified weaknesses in the UK legislation.

To business:

- Ensure statements are signed in accordance with the legislation and are available from a link on the homepage of the company website. Proactively submit statements to the Modern Slavery Registry.

- Include information on all six areas listed in section 54(5) of the Act, in Slavery and Human Trafficking statements. Information on supply chains should include source countries for raw materials and finished goods, and should acknowledge known risks of modern slavery and human trafficking in those supply chains. When reporting under 54(5)a, consider and report on how the company's business model can potentially create risks of modern slavery and human trafficking. Seek to place reporting on action taken to address the risk of slavery and human trafficking within the context of respect for labour rights and human rights.
- Clarify in the statement which parts of the corporate group are covered by the disclosure.
- Consolidate published information on supply chains into one document. Ensure the online format of the Slavery and Human Trafficking statement enables hyperlinks to function.
- Clarify the scope of application of Codes of Conduct and company policies, and describe how these are implemented, how compliance is ensured, and how incidents of non-compliance are dealt with. When discussing membership or use of certification schemes, describe how these are addressing abusive labour practices and disclose any shortcomings to help drive the development of solutions across the industry.
- Develop due diligence programs that incorporate engagement with workers and civil society working on the ground, to move beyond a reliance on social audits and certification.
- Conduct regular reviews and revision of existing programs and policies to ensure they are fit for purpose and evolve with changing modern slavery risks.

To investors

- Make engagement on modern slavery a priority, within the context of respect for labour rights more broadly, checking to see whether companies are in compliance with the TISC reporting requirement.
- Ask companies how they approach specific risks in their supply chains and operations and how they embed their approach to addressing the risk of slavery and human trafficking within their wider approach to human rights.
- Reward companies showing leadership on TISC reporting.

To civil society

- Assess companies' Slavery and Human Trafficking statements in the context of their overall disclosure, including non-ESG-specific information, and assess the reporting of different entities (buyers, processes etc.) in the same supply chain.
- Seek to foster an environment where companies do not fear reputational damage for being open and transparent.

I. INTRODUCTION

Background

Slavery is a global problem, affecting people in every country. It takes many forms, including forced labour, human trafficking, forced prostitution, debt bondage and child marriage, and often has more than one of these elements. While slavery can affect anyone, some people are more vulnerable to exploitation than others. People in poverty with few opportunities for decent work are at heightened risk of exploitation, and people discriminated against due to their race, caste or gender are also more likely to be enslaved. There is a higher prevalence of slavery in countries where the rule of law is weak and corruption is rife.³

Forced labour is the most common element of modern slavery and the most extreme form of human exploitation. The International Labour Organisation (ILO) estimates that 24.9 million people globally are victims of forced labour, 18 per cent of whom are children. Almost 16 million of these people are in the private economy, with the largest numbers in domestic work, construction, manufacturing and agriculture and fishing. Forced labour is estimated by the ILO to generate an annual profit of \$150 billion.

Many products available in high-street shops are made by, or include ingredients grown, harvested or mined by people in slavery. The complexity of some supply chains can make it virtually impossible to guarantee that a product has not been produced using slavery. Forced labour is present in many industries including hospitality, construction and cleaning. The factors driving and facilitating this exploitation are complex, but the way in which companies operate can increase the likelihood of it occurring.

Business models, operating context, and the nature and location of work are major risk factors for serious labour rights violations including slavery and trafficking. Sub-contracting and complex supply chains can make it difficult to monitor adherence to standards, while the presence of labour recruiters in supply chains combined with downwards pressures on costs can lead unscrupulous operators to maximise profits by exploiting workers. Companies operating in, and sourcing from countries where labour laws are not enforced, where labour is cheap, and where workers are discouraged or prevented from joining independent trade unions should ensure they are taking steps to minimise the risk of abusive practices. Finally, sectors that rely on low-skilled and temporary workers, or work carried out in remote locations need to be aware of the heightened vulnerability of workers and respond accordingly.

While there is no single solution, greater transparency around business practices is essential to addressing exploitative practices and associated abuses. In 2010, the U.S. state of California introduced a requirement for companies operating in the state to report on what action they were taking to eradicate slavery and trafficking from their operations and supply chains, with the goal of ensuring companies provide consumers with information that enables them to understand which firms manage their supply chains responsibly. The introduction of the Modern Slavery bill provided the opportunity to build on this provision in the UK.

The bill was given Royal Assent on 26 March 2016. Following pressure from civil society, investors, businesses and parliamentarians, the UK government had amended the bill during its passage through Parliament to include the Transparency in Supply Chains (TISC) clause, requiring all commercial organisations operating in the UK with a turnover of more than £36 million annually to publish a Slavery and Human Trafficking statement, which must include

information on the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business.

This report aims to provide a snapshot of if and how companies are including information in their Slavery and Human Trafficking Statements on the risks of modern slavery in their supply chains and operations, focusing on companies sourcing raw materials associated with a heightened risk of modern slavery - cocoa from West Africa, mined gold, mica from India, palm oil from Indonesia, and tea from Assam - and companies operating in sectors that are widely recognised as being at heightened risk: garment production; hotels and accommodation; construction; football clubs (which due to the nature of their businesses include a wide range of functions including hospitality and retailing manufactured goods); and outsourcing companies.

Methodology

The raw materials and sectors were selected for inclusion in the report based on published materials describing modern slavery risks, and with specific reference to Anti-Slavery International's 'Products of Slavery' publication.⁵ The materials and sectors to be covered were selected before we drew up a list of companies; we did not look at companies' published materials before deciding to include them in the report and the decision to assess a company's reporting was not guided by a pre-assessment of published information.

Companies were selected at random for inclusion in the report, with the following exceptions:

- Companies in the palm oil section were all named in a recent Amnesty International report on labour rights abuses in the palm supply chain. We provide a link to the companies' detailed responses to Amnesty's allegations.
- Companies in the tea section all source from Assam.
- In the football section, we focus on the five English clubs ranked highest in the 2015-16 Deloitte Football Money League.
- We evaluate statements published by several companies selling low-price garments.

To identify Slavery and Human Trafficking Statements we looked for a link to the statement from the homepage of the companies' websites, as per the legal requirement. If no link was found, we checked the Modern Slavery Registry website and lastly conducted a web search using the company name and the term 'modern slavery'. Additional relevant company publications were identified using links in company Slavery and Human Trafficking Statements, searches of company websites and internet searches. The indications in the text of our inability to locate statements and other documents should not be read as inferences that the documents do not exist. We may have overlooked documents or the content of documents, and we are happy make this clear on our website if it is drawn to our attention.

We do not rank companies' reporting or practices based on their statements or other publications.

Structure of this Report

Section II looks at reporting on raw materials risks and is divided into five chapters, covering the following raw materials: cocoa from West Africa; mined gold; mica from India; palm oil from Indonesia; and tea from Assam. Each chapter summarises the risk of forced labour associated with a particular raw material and examines how five companies include information on that risk in their Slavery and Human Trafficking Statements. Section III follows the same format and covers five sectors.

II. AT-RISK RAW MATERIALS

1. Cocoa from West Africa

More than 70 per cent of the world's cocoa is grown in West Africa, with the vast majority coming from Côte d'Ivoire and Ghana, which together produce 60 per cent of the global total. Last year, Côte d'Ivoire exported nearly 1.8 million metric tons of cocoa, two-fifths of the world's production.⁶

Most cocoa farmers in West Africa live in destitute poverty. The reasons for this are complex and multi-faceted, and include low and fluctuating cocoa prices (despite increased demand for chocolate, the average cocoa farmer receives just 6 per cent of the value of a chocolate bar, down from 18 per cent 30 years ago⁷), limited farmer organisation and market power, the small size of farms, uncertain land tenure, sharecropping, low productivity, poor infrastructure and access to market and market information. This poverty is a driving cause for many related problems, including poor working conditions, worst forms of child labour and trafficking, illiteracy and malnutrition.⁸

A 2015 study commissioned by the U.S. Department for Labour estimated that 2.12 million child labourers worked in cocoa production in the 2013/14 cocoa harvest season in Côte d'Ivoire and Ghana. The report estimated that almost 96 per cent of the 2.12 million child labourers in the two countries were involved in hazardous work in the 2013/14 harvest season, representing a 13 per cent increase from the 2008/09 season.⁹

Certified cocoa is produced according to standards set by several independent bodies which outline requirements for sustainable cocoa production. According to the 2015 Cocoa Barometer, of the five major chocolate manufacturers featured in this report Mars, Hershey, Lindt & Sprüngli and Ferrero are committed to using 100 per cent sustainable and/or certified cocoa by 2020. All are following different strategies in defining sustainability, some using standard bodies' certification, some working through their own projects, and others combining both approaches. Audits are conducted to certify that the requirements of the standard are met.¹⁰

In the first quarter of 2017 certification agencies UTZ and ICI warned that more children were at risk of child labour due to falling cocoa prices.¹¹ Prices hit a four-year low in February¹² with reports suggesting that the price for Ivorian farmers could fall by 30 per cent.¹³ In April, the Cocoa Barometer Consortium released a consultation paper calling for a higher fixed farm gate price, combined with flexible premiums to reflect the farm gate price and to guarantee a living income for farmers. Commenting at the time, the paper's co-author Antonie Fountain said, 'Everyone agrees that a price increase is not the only thing we need to be looking at. But it seems that we are looking at everything except how to raise prices for cocoa farmers.'¹⁴

Summary analysis of company statements and other publications

We found four stand-alone Slavery and Human Trafficking statements (Ferrero, Hershey, Lindt & Sprüngli and Mars), while Mondelez has adopted the approach of stating that it provides a range of information in compliance with the reporting requirement. Reports from Ferrero, Hershey and Lindt do not describe the companies' supply chains and do not list source countries for cocoa, though this information is provided in other company publications. The risks of modern slavery in the cocoa supply chain are not acknowledged. The Mars statement

acknowledges that severe human rights risks, including forced labour, may be present in the cocoa supply chain, and mentions the company's efforts to put in place remediation systems related to child labour and forced labour. Hershey expresses its commitment to eliminating 'illegal and forced child labour' from its supply chain.

Mondelez's documents provide detail of its Cocoa Life Program, of which two global key performance indicators are net income from cocoa for men and women; and reduction in child labour and forced child labour. It reports findings from a needs assessment with cocoa farmers in five major regions of Côte d'Ivoire, which found that 97 per cent of farmer members earn most income from cocoa and almost 70 per cent of these farmers 'think they do not earn enough for basic family and farming needs'.

Other relevant published information includes Hershey's acknowledgement of 'the long-embedded challenges in the West Africa cocoa supply chain that perpetuate abusive labour practices' and a description of its 2016 stakeholder consultation exercise that identified supply chain sourcing and labour conditions as priority issues. Several companies report on in-county programs with cocoa farmers, and Mars and Mondelez both refer to declining farmer incomes. We could not find any substantive discussion of price issues in the cocoa supply chain.

Ferrero UK Ltd

Ferrero UK Ltd is a subsidiary of the Italian confectionary manufacturer Ferrero S.A. that owns brands including Nutella, Ferrero Rocher and Kinder Bueno. Its global parent company The Ferrero Group reported an annual turnover of €10.3 billion in 2016.¹⁵

Slavery and Human Trafficking Statement

Available at <https://www.modernslaveryregistry.org/companies/7246/statements/9074>. The company states its determination to contribute to the elimination of all forms of slavery. The statement does not acknowledge the specific risks of modern slavery associated with cocoa production, simply stating, 'Ferrero acknowledges that raw materials are produced in rural areas, and that rural development is the real driver to help farmers, workers, and their families.' No information is provided on source countries for cocoa. The company reports the use of third-party audit and supplier self-assessment to assess compliance with labour and human rights standards. Human rights due diligence is not discussed.

Other relevant information available on the company's website

In a 2012 press release Ferrero announced its goal '...to achieve independent and credible third-party verification of the sourcing of all of its cocoa by 2020. This verification will aim to ensure, among other issues, that trafficking, the worst forms of child labour and forced adult labour, will be eradicated from the plantations that Ferrero source its cocoa from.'¹⁶

Ferrero's most recent Corporate Social Responsibility Report (2015) includes a section on cocoa, where it reports that it sources cocoa from 'Côte d'Ivoire, Ghana, Nigeria, Ecuador, Cameroon and others.' It gives details of its engagement since 2012 in a private-public-partnership project with IDH, Oxfam Novib, Continaf, Petra Foods Limited and Farmers' Development Union (FADU) in Nigeria which has included a series of awareness-raising activities to support the elimination of child labour. A farmer interviewed in 2014 about her involvement in the programme says that she has '...fourteen casual labourers working for me.'

A project (which ended in 2015) in Ghana with the National Programme for the Elimination of the Worst Forms of Child Labor in Cocoa aimed at 'a measurable reduction in the worst form of child labor' included establishing monitoring systems and the provision of training to communities and farmers. Another project in Ghana involved the use of GeoTraceability to map 9,730 farmers, with the goal that 13,000 would be mapped by 2016. Lastly, the company reports that in Côte d'Ivoire, three out of seven cooperatives that supply it with Fairtrade cocoa took part in a programme to prevent child labour.¹⁷

The company's Code of Business (link included in statement) says '...we support...the Conventions of the International Labour Organization (ILO)...'. The Code outlines the company's expectations of suppliers to respect human rights and labour rights, states that it 'favours long-term contracts, where possible, to help ensure a more stable income for farmers' and that in cases of non-compliance [with the Code], Ferrero will demand corrective measures and reserves the right to terminate any agreement.¹⁸ Ferrero's Code of Ethics (link included in statement)¹⁹ states that the company 'requires observance of working conditions and wages in accordance with international regulations' (p. 53). The Code of Ethics also states:

'We require our suppliers:

- to respect work legislation and regulations in accordance with international standards;
- to not resort to the use of child labour or forced labour in its work;

We will not engage in a relationship with suppliers who do not accept these conditions (p. 57).

Ferrero also notes that:

'Relations with suppliers are regulated by Company procedures and are subject to constant monitoring. To guarantee maximum transparency and efficiency in the purchasing process, Ferrero also:
monitors the ownership of its suppliers;
ensures traceability of all choices made.' (p. 58)

Hershey

Hershey is an American chocolate manufacturer that produces brands including Kit Kat and Reeses. The company reported net sales of \$7,440.2 million in 2016.²⁰

Slavery and Human Trafficking Statement

Available at <https://www.thehersheycompany.com/content/dam/corporate-us/documents/legal/hsy-slavery-human-trafficking-statement.pdf>. Undated.

The statement sets out Hershey's commitment to purchasing 100 per cent certified and sustainable cocoa, and says that each certification program prohibits the use of forced and illegal child labor. It states its commitment to eliminating 'illegal and forced child labour' from its supply chain. The company uses independent audit to assess supplier standards. No information is provided on due diligence and the supply chain is not described. Source countries for cocoa are not listed.

Other relevant information available on the company's website

In its Code of Conduct, Hershey says it is committed to fair employment practices everywhere it operates and to eliminating illegal employment from its supply chains. It states that it does not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced or prison labor or human trafficking.²¹

Hershey's Supplier Code of Conduct states that, 'Suppliers must not utilize or benefit in any way from forced or compulsory labour, including any forms of slavery' and that 'The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force, coercion or other means, for the purpose of exploiting them is prohibited.' The Code also includes provisions on wages, freedom of association, non-discrimination and health and safety.²²

In its 2016 CSR Report ²³ the company states that it '...acknowledges the long-embedded challenges in the West Africa cocoa supply chain that perpetuate abusive labor practices.' The company says it is committed '...to operating our business with the highest ethical standards...'

'We manage our supply chain as sustainably and holistically as possible so that we can protect these important regions and support economic development. Our sourcing policies and purchases are intended to maximize positive social and economic impact while minimizing any potential negative environmental effects.'

While acknowledging that certification alone cannot address all economic and social challenges in cocoa-growing communities, Hershey states that certification:

'...is an important tool that can drive economic, social and environmental progress throughout the value chain. Working with independent auditors to verify our supplies of certified cocoa ensures that growers are meeting high international standards for labor, environmental and farming practices.'

The report goes on to state that the company does not tolerate, and is committed to preventing any illegal and abusive forms of forced child labour across its entire supply chain. In 2016 the company reached out to stakeholders including workforce, suppliers, non-governmental organisations and community groups, investors and industry associations to conduct a comprehensive review of environmental, social, governance and economic topics relevant to its business operations and its stakeholders to determine the list of issues to be considered in its priority issues analysis, and then identified the points on its value chain where impacts on the company associated with priority issues occur. Supply chain sourcing and labour conditions scored highly under both criteria, and were then mapped to related GRI topics ²⁴.

The CSR report includes Hershey's GRI content index. Under GRI General Disclosure 102-111 the company reports that:

'We take several approaches to enterprise risk management, for example, heat mapping, situational assessments, RACI charts, SWOT analyses and competitive intelligence. In addition, our Vice President of Corporate Communications and Corporate Social Responsibility serves on the enterprise risk management committee.'

Lindt & Sprüngli

Lindt is a Swiss chocolatier and confectionary company that manufactures and retails chocolate goods around the world. It reported income of 418.88 million Swiss Francs (approximately £333 million) in 2016.²⁵

Slavery and Human Trafficking Statement

Available at http://www.lindt.fr/fileadmin/user_upload/uk/Homepage/Modern_Slavery_Act_Statement/Modern_Slavery_Act_Statement.pdf Dated 30 June 2017.

The statement does not mention the specific risks of modern slavery in the cocoa supply chain. The company's supply chain is not described, however there are references to farming programmes in Ghana, Ecuador and Madagascar (the document is a scanned pdf so links are non-functioning).

Other relevant information available on the company's website

One of the company's commitments and strategic goals in its Sustainability Report 2016 is that core labour standards are respected in its supply chain. The report specifies that the Supplier Code of Conduct (which could not be found on the company's website) requires suppliers to take responsibility for their own suppliers, subcontractors, and agents and/or farms by identifying potential breaches to the Code. The report says that for key raw materials, the company has committed to develop and maintain long-term relationships with its suppliers.

Lindt lists Ghana, Ecuador, Papua New Guinea and Madagascar as source countries for cocoa beans. Noting that more than half of the world's cocoa harvest comes from Côte d'Ivoire and Ghana, Lindt states that since 2005 it has used only cocoa beans from Ghana in its chocolate 'because the conditions for responsible and high-quality procurement are better...'²⁶ The company states that its entire cocoa bean supply chain in Ghana is traceable and it is working towards a fully-traceable supply chain by 2020.

Page 15 of the Sustainability Report gives details of the company's Action Plan against child labour in Ghana. This included training, unannounced visits to farms, remediating cases identified and conducting follow-up visits. Remediation activities may include: discussions with, and sensitization of parents; access to labour services; support for the refurbishment of primary schools; additional income-generating activities; training on managing inputs and labour more efficiently. As a last resort, farmers not willing to follow the Ghana Hazardous Child Labor Activity Framework are excluded from the Program.²⁷

Mars

Mars is an American global manufacturer of food products. Mars reported \$33 billion in revenue in 2014.²⁸ It is a private company.

Slavery and Human Trafficking statement

Available at <http://www.mars.com/global/sustainability/human-rights/modern-slavery-act-2017>, dated May 2017. In a section of the statement headed Human Rights in Sustainable Sourcing, the company states:

'We focus on advancing respect for human rights in our extended supply chains. We do so in close collaboration with our suppliers, their business partners, the industry, government and communities. We prioritise work on supply chains in which the most severe human rights risks, including forced labor, may be present, including, for example, cocoa, fish and palm oil.'

A section headed 'Strategy in Action', gives brief information about Mars' work in the cocoa supply chain in West Africa '...to put in place emerging best-practice human rights monitoring and remediation systems related to child labor and forced labor.' It further states that Mars is seeking to drive impact and industry action through work with the ILO, the International Cocoa Initiative and the World Cocoa Foundation. The statement includes a link to a webpage with more information on Mars' approach (see below).

Other relevant information available on the company's website

On the webpage <http://www.mars.com/global/sustainability/raw-materials/cocoa>, Mars acknowledges that in some places cocoa farmers' yields, incomes and quality of life are in decline. Mars describes its approach to cocoa as working with individual farmers to 'increase their yields and incomes'. The company aims to reach as many farmers as possible by certifying its entire cocoa supply by 2020, and encouraging others in the industry to commit to certification. The company reports that in 2016 more than 50 percent of its cocoa came from certified sources. It states:

'Certification is the best tool we in the cocoa industry have to provide farmers worldwide with consistent and continued support. Our cocoa certification practices aim to go beyond our existing activities by introducing new productivity measures that will help make sure certification directly increases growers' incomes.'

Mars Human Rights policy states that the company '...will implement a due diligence process to identify, mitigate and prevent adverse impacts on human rights and appropriate mechanisms for remediation.'²⁹ The company has a Supplier Code of Conduct,³⁰ however this sets out expectations for first-tier suppliers only.³¹

Mondelez

Mondelez International is an American multinational snacking and beverage company that owns brands including Cadbury's, Ritz, Philadelphia, Green & Blacks and Oreo. It reported revenue of \$26 billion in 2016.³²

Slavery and Human Trafficking Statement

Text on a web page titled 'Compliance and Integrity' reads: '...in line with the California Transparency in Supply Chains Act (SB 657) and the UK Modern Slavery Act 2015, the links below provide more detail on our efforts to help make a difference in our operations and those of our suppliers.'³³

Other relevant information available on the company's website

Cocoa Life is a Mondelez program that 'works directly with cocoa farmers to provide training and community planning skills.' In the 2015 Cocoa Life Progress Report, Mondelez states that

21 per cent of the cocoa it buys for its brands displays the Cocoa Life logo. The Report notes that cocoa farming is no longer a prosperous business for many small producers. Among the company's ten global key performance indicators are: net income from cocoa for men and women; and reduction in child labour and forced child labour. The implementation of the program is monitored by FLOCERT which tracks payment from Mondelez International to the suppliers and in turn to communities included in the Cocoa Life program.

The report states that the company aims to reach one million community members in six key cocoa-growing origins - Côte d'Ivoire, Ghana, Indonesia, India, the Dominican Republic and Brazil by 2022. Mondelez reports that in May 2014, it conducted a needs assessment with cocoa farmers in five major regions of Côte d'Ivoire, finding that 97 per cent of farmer members earn most income from cocoa and almost 70 per cent of these farmers 'think they do not earn enough for basic family and farming needs.' The implication for the company was 'to focus efforts on increasing income from sources other than cocoa, mainly through the empowerment of women farmers.' We could not find any references to the price the company pays for cocoa.

In a section of the report on child labour, Mondelez describes how it partnered with human rights consultancy Embode to analyze the environment and national child protection infrastructure in Côte d'Ivoire, Ghana and Indonesia and describes how it is attempting to respond to the problem in a holistic way.³⁴

2. Mined Gold

Gold mining is a global business that has grown significantly in the past decade. The production of gold spans every continent except the Antarctic and three-quarters of the world's gold sources are now exhausted.³⁵ No single country dominates production, however three-quarters of gold imported by the US comes from Latin America.³⁶

Generally, 75 per cent of the gold supply is newly mined and the remainder is recycled.³⁷ Large scale mining, where gold is extracted using high-tech machinery forms only part of the industry. Where there is little access to investment and a country's mining legislation and infrastructure are weak, large scale operations are replaced by labour intensive artisanal small-scale mining (ASM). According to the United Nations, ASM employs 10-15 million miners and produces 25 per cent of the world's gold.³⁸

Despite the diminishing supply and declining price of gold, global investment and demand for luxuries such as jewellery and electronics has dramatically increased. This has led to a boom in illegal artisanal mining in remote and poorly governed regions around the world.³⁹ Criminal gangs that once thrived off drug trafficking now dominate the illegal gold mining industry and control many hundreds of thousands of the world's poorest populations who work for them.

The ILO estimates that close to one million children work in mines worldwide and child labour is strongly associated with gold ASM.⁴⁰ The combination of poverty, organised crime and political instability leaves children vulnerable to exploitation and the impact on child welfare is severe due to the dangerous nature of the work. Impoverished and often caught in debt bondages, families are forced to send their children to work mines and face the risks of lethal accidents, mercury poisoning and exposure to disease.⁴¹

Growing concern about the social and environmental impact of illegal ASM has resulted in some action in the public and private sphere to improve supply chain transparency. In 2012 the OECD published a section targeting artisanal small-scale mining in its multi-stakeholder process, Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; and stakeholders in the Swiss economy – which currently holds around 50 per cent of the world's gold refining capacity - set up the Better Gold Initiative to support their implementation.⁴²

Certification initiatives are run by Fairtrade International and the Alliance for Responsible Mining (ARM) in partnership with the Responsible Jewellery Council.⁴³ Companies seeking certification are subject to third-party audits.⁴⁴

Summary analysis of company statements and other publications

All five companies have published statements. None of the statements include substantive information on gold supply chains or the risks in those supply chains. One company (Pandora) mentions due diligence, but provides brief information only. Other companies report on their use of audits and membership of the Responsible Jewellery Council.

In additional published materials, Richemont reports that a stakeholder engagement exercise identified sourcing issues as being most material to its business, and states that it has conducted an analysis of risks in its upstream supply chain, in particular raw materials, and that it requests suppliers to provide assurance that gold supplied has been mined in a way which respects human and labour rights. Pandora reports that its main human and labour rights risks are to be found among its suppliers, but additional detail on identified risks is not provided. We found Supplier Codes of Conduct on every company website other than Tiffany's.

Cartier Ltd (Richemont)

Cartier is owned by Richemont, a Swiss-based luxury goods holding company. Through its various subsidiaries Richemont designs, manufactures, distributes and sells premium jewellery and other goods. Richemont is publicly traded as CFR on the SIX Swiss Exchange and the JSE Securities Exchange. Richemont reported a profit of €2 billion in 2016.⁴⁵

Slavery and Human Trafficking Statement

Available at <https://www.richemont.com/corporate-social-responsibility/sourcing-and-product-integrity/human-rights-and-labour-standards-in-the-supply-chain.html>. Not dated. Unsigned.

The statement makes no mention of risks related to gold sourcing. It says that 200 external supplier audits were carried out on behalf of Richemont's 'Maisons' and that many of Richemont's suppliers are also members of the Responsible Jewellery Council.

Other relevant information available on the company's website

In the 'Sourcing and Product Integrity' section of its website, Richemont notes that a stakeholder engagement exercise identified sourcing issues as being most material to its business.⁴⁶ The company reports that in the three years to 2017 it increased the proportion of gold and diamonds sourced from suppliers certified under the RJC Code of Practices Standard, that the overwhelming majority gold and diamonds now come from RJC-certified sources, and a growing proportion of the gold is certified under the Chain of Custody Standard. The company has identified a continued focus on traceability, including further increases in the proportion of key raw materials sourced from certified suppliers as a target for 2020.⁴⁷

The 'Responsible Sourcing of Raw Materials' section on the website notes that there have been social and human rights issues surrounding the sourcing of gold and states that the company's long-term goal is traceability of all raw materials used in its products. It states that it has conducted an analysis of risks in its upstream supply chain, in particular raw materials. The company requests its suppliers to provide assurance that the gold being supplied has been mined in a way which respects human and labour rights, and states that it works with suppliers and refiners to seek to improve controls over the supply chain. The company is participating in a review of the RJC's 2012 Gold Chain of Custody standard.

45 per cent of Richemont's suppliers are currently recorded as signatories to the company's Supplier Code of Conduct, representing in volume terms 25 per cent of the supplier base. The company states that it expects these figures to progress year-on-year. External audit is used to assess compliance with the Code and is initiated on a risk-based assessment.⁴⁸

The company provides a short case study on efforts to achieve 100 per cent certification of gold.⁴⁹

Richemont's Supplier Code of Conduct requires suppliers to assure that the gold and/or platinum group metals supplied to the company - from all sources - meet international standards for responsible business practices and are conflict-free. Suppliers shall provide assurance as far as possible that gold and/or platinum group metals being supplied have been mined responsibly in a manner that respects human and labour rights. The Code also states that suppliers shall uphold the eight Fundamental ILO Conventions, and prohibit the use of forced and child labour.⁵⁰

Goldsmiths (Aurum Group)

Goldsmiths is a UK jeweller and part of the Aurum Holdings Group Ltd. Aurum reported turnover of £454 million in 2016.⁵¹

Slavery & Human Trafficking Statement

Available at <http://www.goldsmiths.co.uk/i/modern-slavery-act-transparency-statement>. The statement covers all companies in the Aurum Group. There is no explicit reference to possible risks of modern slavery in the gold supply chain. The company lists principal source countries for jewellery and watches, and reports that fourteen of its of jewellery and precious metal suppliers are Responsible Jewellery Council members.

The company reports that it has also produced its own Supplier Manual, which is provided to all suppliers of watches, jewellery and precious metals. Suppliers are asked to return a letter of acceptance to confirm that the supplier and its staff will comply with the specifications and requirements set out in the Manual. Within the Supplier Manual is a Supplier Code of Conduct, which contains twelve principles including:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Child labour shall not be used
- Living wages are paid.

Other relevant information available on the company's website

On the Corporate Social Responsibility page of its website, Goldsmiths states that it complies with relevant international laws and industry regulations when sourcing its products and insists on written guarantees from suppliers that products comply with international regulations. It says that all gold is bought from legitimate sources, but no further detail is provided. Goldsmiths is a signatory of CAFOD's 12 Golden Rules initiative (to ensure gold mining minimises damage to the environment and communities local to the mines).⁵² The code of conduct for suppliers is provided in full; this appears to apply to suppliers of manufactured products only, however it does include a clause stating that 'Goldsmiths will not knowingly purchase or sell any products that originate from a group or a country which supports or engages in illegal, inhumane or terrorist activities.'⁵³

Pandora

Pandora is a Danish company that manufactures and retails jewellery internationally. In 2015 its total revenue was DKK 16.7 billion (approx. €2.2 billion).

Slavery & Human Trafficking Statement

Available at <http://pandoragroup.com/CSR/People/Human-rights>. Dated 9 February 2016.

The statement says that 96 per cent of the gold grains used at the company's crafting facilities originated from recycling and the remaining 4 per cent from certified responsible mining. Countries of origin are not provided and there is no discussion of potential modern slavery risks. The company provides a brief description of its human rights due diligence process.

Other relevant information available on the company's website

Pandora's Slavery & Human Trafficking statement includes a link to its annual Ethics Report. The report states that the company regularly assesses potential human rights risks in its own value chain, either internally or in cooperation with external experts and peers, and that the general conclusion of these assessments is that the main human and labour rights risks are to be found among its suppliers. No additional detail is provided on identified risks.

The company states that its approach to lowering the risks of causing or becoming complicit in human rights infringements is to source core jewellery materials from certified responsible suppliers, to require suppliers to sign and comply with the suppliers' Code of Conduct, and to enroll all suppliers in an internal Responsible Supplier Programme that includes risk assessment, training, internal and external audits. The report also sets out that manufacturers of semi-finished gold and silver parts are required to deliver auditable proof that the gold used in their products is sourced from certified suppliers. The report includes KPIs on auditing, certification, supplier training and enrolment in the Responsible Suppliers Scheme.⁵⁴

In its Responsible Supplier Policy Pandora states that 'The majority of ethical dilemmas facing the jewellery industry are associated with the initial activities in the supply chain such as mining, mineral trading and stone cutting processes.' The document provides a summary of how Pandora seeks to address these issues.⁵⁵

Pandora's Supplier Code of Conduct applies to all its suppliers and its provisions extend to all activities and workers. The Code prohibits the use of child labour and forced labour, and includes provision on freedom of association and collective bargaining, wages, working hours and health & safety.⁵⁶

Signet Jewelers Ltd.

Signet Jewelers is the largest specialty jewellery retailer in North America and the UK, operating approximately 3,600 stores under brand names including H. Samuel and Ernest Jones. It has annual sales of approximately \$6.4 billion and is listed on the New York Stock Exchange.⁵⁷

Slavery and Human Trafficking Statement

<http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/default.aspx> (under drop down 'COMPLIANCE WITH NATIONAL/INTERNATIONAL LEGISLATION') Dated 21 November 2016.

Signet reports that risk assessments of its significant suppliers are conducted by independent external third parties and if potential risks are identified, a course of action is determined to best address them. No additional information is provided.

The statement says that 'many' of Signet's largest suppliers are certified members of the Responsible Jewellery Council and that Signet encourages all its suppliers to be members. No substantive detail is provided on the company's supply chain. It reports that for all suppliers, purchase order terms and conditions include statements regarding compliance with all laws. All Signet employees responsible for supply chain-related decisions and product purchasing are required to complete training and assessment programs which include identifying and addressing human trafficking and slavery in Signet direct supply chains. Further details are not provided in the statement.

Other relevant information available on the company's website

Under the heading 'Gold Supply Chain Information' on its Responsible Sourcing webpage, the company states that, 'We are aware of the issues being raised over mining practices and we take them very seriously.' The rest of the page gives information about the Responsible Jewellery Council.⁵⁸

Signet's Supplier Code of Conduct sets out its expectation that all its suppliers comply with their national laws and regulations and respect the fundamental International Labour Organization conventions and the Universal Declaration of Human Rights. Suppliers are expected to comply with local laws in respect of minimum wages, working hours, employee benefits and overtime and not to permit the use of forced labour. The policy states that 'Signet objects to the employment of persons younger than 15 years of age (or 14 where the law of the country permits)...' and that 'Child labor should be phased out in a responsible manner.'⁵⁹

Tiffany & Co

Tiffany is an American jewellery retailer. It reported earnings of \$446 million in 2016.⁶⁰

Slavery and Human Trafficking Statement

Available at <http://www.tiffany.co.uk/sustainability#p+1-n+1000-c+-s+-r+-t+-ni+1-x+-pu+californiaTransparencyAct-f+-lr+-hr+-ri+-mi+-pp+>. Not dated.

The link from the website homepage is to a page that includes a short pop-up text. The statement says that audits are conducted by a third party and 'third-party verification is required of all our high-risk suppliers in the Social Accountability Program, determined by a review of the vendor's self-assessment, industry and geographic location.' No specific information is provided on risks or due diligence.

Other relevant information available on the company's website:

None found.

3. Mica from India

Mica is a key raw material for numerous industrial and consumer goods sectors and is found in cosmetics, car paint, electronic components and construction materials. Global demand for mica is predicted to rise over coming years. India produces more than 60 per cent of the world's mica, with around 25 per cent of global production coming from illegal collection in north east India,⁶¹ run by cartels who control workers through debt bondage and employ children at a low cost. Around 20,000 children are estimated to work in hundreds of small-scale mines in northern Jharkhand and southern Bihar states.⁶²

A 2015 report by research centre DanWatch found that families with children working in the mica mines tend to be poor, landless and casteless/Dalits. The adults may have other work as day labourers in agriculture, construction or other mines, but often the families have no other source of income. Many of the children either do not attend school or attend for a few years before dropping out to start work. In many cases, the whole family works extracting mica with several generations having received no education. A day's earnings are between £1.20/€1.40 - £1.80/€2.20 per person.⁶³

According to DanWatch, L'Oréal and 11 other cosmetics companies could not exclude the possibility that mica in their products comes from child labour in illegal Indian mines. Estée Lauder and LVMH / Dior were also listed in the report as purchasing mica mined in India. L'Oréal and LVMH / Dior did not respond to a DanWatch questionnaire about labour rights standards and mica sourcing; Estée Lauder referred researchers to its CSR report.⁶⁴

In 2016 a Thomson Reuters investigation revealed that seven children had died in illegal mica mines in just two months.⁶⁵ In early 2017 the Indian government announced that it would legalise mines to address black market abuses and a new multi-stakeholder initiative involving NGOs and a number of industries was founded with the goal of reaching a 100 per cent sustainable Indian mica supply chain in the next five years. L'Oréal, Estée Lauder and Revlon are among the members.⁶⁶

Summary analysis of company statements and other publications

We found statements from every company except Dior / LVMH. None of the statements include substantive information on raw material supply chains or the risks in those supply chains. There are no references to mica in any of the statements. Walgreens reports that one of its biggest current risks is within the product supply chain of its owned brands and Estée Lauder states that it has used some third-party certification standards to establish that certain raw materials it purchases are produced without the use of forced labour. L'Oréal reports that raw materials are purchased at group level.

A page on L'Oréal's website headed 'Sustainable Mica Sourcing' gives details of mica source countries including India. The company reports that it is implementing a sustainable procurement policy in India based on a limited number of suppliers who have committed to sourcing from legal gated mines only and that it has engaged in collaborative action with stakeholders across industries and along the value chain (from end users to communities) in order to gain more leverage and achieve long-term solutions. The company reports that 97 per cent of its mica comes from secured sources and that by the end of 2016, 100 per cent will be secured from completely verified sources.⁶⁷

Boots (Walgreens Boots Alliance)

Boots is a pharmacy chain operating in the UK and Ireland that sells pharmaceutical, healthcare and beauty products. It sells own-brand products such as No. 7, Natural Collection and Soltan as well as brands owned by other companies. It is a subsidiary of the American publicly listed company Walgreens Boots Alliance, which reported a profit of \$29.9 billion in 2016.⁶⁸

Slavery and Human Trafficking Statement

Available at <http://www.walgreensbootsalliance.com/modern-slavery-and-human-trafficking-statement/>. Not dated.

The statement does not include a description of the supply chain, and instead directs readers to information in the company's CSR report. The company has contracted with Dow Jones Risk & Compliance to provide due diligence reviews of business partners globally; reviews check for adverse media which can trigger an audit and contract termination in case of failure to implement remediation plans.

The company's modern slavery working group has examined internal and external operations that could potentially be exposed to a modern slavery risk, including its own labour, suppliers and key countries. It says it plans to use this to develop a continuing action plan targeting the highest risk operations, and that this will need to be a phased approach given the scale and complexity of the business. Walgreens has identified that one of its biggest current risks is within the product supply chain of its owned brands and it uses supplier assessment and contract requirements to address this. It conducted 1,200 compliance assessments on new and existing owned brand suppliers in 2016. It plans to keep its assessment program under review.

There is no explicit reference to mica sourcing or to risks of modern slavery in mica mining in the statement.

Other relevant information available on the company's website

None found.

Dior / LVMH

Dior is French luxury goods company that designs and retails a range of items including make-up. It is owned by LVMH. LVMH reported revenue of €19.7 billion in the first half of 2017.⁶⁹

Slavery and Human Trafficking Statement

A statement available at https://www.dior.com/couture/en_gb/legal-terms appears to cover the fashion and accessories arm of the business only. No other statement could be found on the Dior website, the LVMH website or on the Modern Slavery Registry.

Other relevant information available on the company's website

None found on the Dior website. The LVMH 2016 Sustainability Report states that 'The LVMH group considers its relations with suppliers to be an essential part of its value chain. As such, the Group places a priority on maintaining and promoting responsible relations with its

partners, suppliers and subcontractors.' The Report provides a short breakdown of audits conducted in 2016.⁷⁰ No other substantive information is provided.

Revlon

Revlon Inc. is a multinational American cosmetics company trading under the name Revlon International Corporation in the UK. It reported revenue of \$1.4 billion in 2016.⁷¹

Slavery and Human Trafficking Statement

Available at <http://www.revlon.co.uk/about/anti-slavery-statement>. Not dated.

Revlon states its zero tolerance approach to modern slavery within its operations and supply chain. The company reports that it is in the process of enhancing its responsible and ethical sourcing practices, including a new Third Party Code of Conduct, a new approach for mapping and prioritising risks in the supply chain, and new procedures for compliance monitoring, auditing, and developing corrective and preventative action plans. It states that its new Third Party Code of Conduct prohibits modern slavery in its supply chain and requires suppliers to adhere to applicable wage and benefits laws, work hour limitations, worker freedom of association laws and health and safety laws. Breach of the code may be considered as a breach of legal agreement between the company and the supplier. This Code could not be found on the company's website. No information is provided on raw material sourcing and human rights due diligence is not mentioned.

Other relevant information available on the company's website

On the 'Ingredients' page of its website, Revlon states that 'Although Revlon, Elizabeth Arden and the other brands in our company's portfolio use limited quantities of mica sourced from India, the complex socio-economic challenges related to this supply chain are of great concern to us. As such we have joined the Responsible Mica Initiative.'⁷²

Estée Lauder UK & Ireland

Estée Lauder Companies Inc is an American cosmetics company. It reported earnings of \$1.1 billion in 2016.⁷³

Slavery and Human Trafficking Statement

Available at <http://www.esteelauder.co.uk/corporate-statements>. Dated 21st December 2016.

The statement outlines the company's prohibition on the use of all forms of forced labour. It says that 'Estée Lauder has used some certification standards providing third-party certification that certain raw materials we purchase are produced without the use of forced labour, including the Roundtable on Sustainable Palm Oil (RSPO) and the Forest Stewardship Council (FSC).' No further detail is given. Under 'Further Action', the company says that it intends in 2017 to require prospective suppliers in higher-risk industries to provide information about the steps they are taking to eradicate forced labour and human trafficking from their supply chain when bidding to supply goods and services to Estée Lauder. No specific information is provided on raw material sourcing or human rights due diligence.

Other relevant information available on the company's website

None found.

L'Oréal UK

L'Oréal is a French cosmetics company and the largest cosmetics firm globally. Subsidiaries include Lancôme, Garnier and Maybelline. L'Oréal reported revenue of €25.8 billion in 2016.

Slavery and Human Trafficking Statement

Available at http://www.loreal.co.uk/sites/default/files/cms/loreal_msa_statement_2016.pdf

The statement says the company has a zero-tolerance policy with regards to any type of forced labour including modern slavery. A description of the supply chain and the company's operations is included in the statement and it reports that it relies on both direct and indirect suppliers worldwide for raw ingredients, which are purchased by the L'Oréal group in Paris. The company requires key raw material suppliers in high risk countries to 'receive social audits'. There are no further details on raw material sourcing in the statement, other than a reference to a requirement in the Conditions for the Supply of Goods and Services that goods and services supplied are not manufactured or sourced using forced labour. The Due Diligence section of the statement says that 'third party labour agencies used to recruit labour for supplier sites (particularly in Asia)' is one of several areas recognised as being associated with increased risks of slavery. The description of the due diligence process suggests it consists primarily of audits. The company's 2018 targets include ensuring that the recruitment agencies/labour brokers it works with agree to comply with its human rights standards, namely with regards to modern slavery.

Other relevant information available on the company's website

A page on L'Oréal's website headed 'Sustainable Mica Sourcing' gives details of mica source countries (60 per cent from the United States; the rest from other countries such as India) and outlines the company's decision to remain in India and ensure the traceability and transparency of its supply chain, on the grounds that '...discontinuing the use of Indian mica would further weaken the situation in the region.' The company reports that it is implementing a sustainable procurement policy in India based on a limited number of suppliers who have committed to sourcing from legal gated mines only, where working conditions can be closely monitored and human rights respected. L'Oréal reports that it has engaged in collaborative action with stakeholders across industries and along the value chain (from end users to communities) in order to gain more leverage and achieve long-term solutions. It contributed to the Responsible Mica Sourcing Summit in February 2016 in Delhi. The company reports that 97 per cent of its mica comes from secured sources and that by the end of 2016, 100 per cent will be secured from completely verified sources.⁷⁴

Page 23 of L'Oréal's Sustainability Progress Report provides information on its assessment of its suppliers' CSR policies and the number of audits conducted on suppliers. An overview of engagement with stakeholders is also provided.⁷⁵ The company's Code of Ethics states that allegations of forced labour should be investigated by an external auditor.⁷⁶

4. Palm Oil from Indonesia

Palm oil is an edible vegetable oil derived from the fruit of oil palms, largely produced in Malaysia and Indonesia and then traded to countries around the world for use in a variety of consumer and commercial purposes. Palm oil and palm derivatives are found in half of all supermarket products and are in high demand by food companies due to their low market price and versatility. Global demand for palm oil has increased rapidly, with production doubling over the last decade and recent estimates suggesting it will double again by 2020.⁷⁷

The most influential organisations in palm oil production are large, listed companies that own and operate private estate plantations in both Malaysia and Indonesia. With the phenomenal growth of the industry, these companies have also grown and are some of the most influential and most profitable businesses in Southeast Asia. The industry is now one of the most significant employers in Malaysia and Indonesia, employing as many as 3.5 million workers, many of whom are victims of serious labour exploitation: workers are trafficked into bonded labour; forced to work and live under extreme conditions, with limited legal recourse; suffer from abuse or the threat of abuse or are victims of child labour. Human trafficking and labour rights abuses in the palm oil sector are driven by transnational and domestic migration, as well as displacement of local farmers near plantations. Workers on oil palm plantations are particularly vulnerable to modern slavery because of the isolation of palm groves.⁷⁸

In September 2016 Amnesty International published 'The great palm oil scandal: Labour abuses behind big brand names',⁷⁹ investigating systemic child labour and forced labour in palm oil plantations in Indonesia run by the world's biggest palm oil grower, Singapore-based agri-business Wilmar. Wilmar acknowledged that there are ongoing labour issues in its operations. Amnesty traced palm oil from Wilmar plantations to nine global firms including Colgate-Palmolive, Kellogg, Nestlé, Procter & Gamble and Reckitt Benckiser. When contacted by Amnesty, none of the companies denied that the abuses were taking place, nor did any provide examples of action taken to deal with labour rights abuses in Wilmar's operations ([full details of the companies' responses are available here](#)). Three of the five palm growers that Amnesty International investigated in Indonesia are certified as producing 'sustainable' palm oil under the Roundtable on Sustainable Palm Oil, a multi-stakeholder organisation established in 2004 in response to concerns about the environmental impacts of palm oil.⁸⁰

According to the U.S. Department of State and the U.S Department of Labor, palm oil is also produced with forced labour or forced child labour in Burma, Ecuador and Sierra Leone.⁸¹

Summary analysis of company statements and other publications

All five companies have published statements. Kellogg provides no substantive information on its supply chain and does not mention raw material sourcing. Colgate reports on the scale of its business and provides a link to its policy on palm oil sourcing. It has identified that vulnerable groups including individuals working in high-risk geographies or industry sectors where human rights abuses are most common are most likely to be impacted by human rights issues. The company has assessed over 75 per cent of its spend with direct material suppliers operating in high-risk geographies, including raw material suppliers. Nestlé reports that it sources raw materials from more than 4.1 million farmers, including 760,000 smallholders. It has identified 11 salient human rights risks, the top seven of which relate to labour rights issues. Palm is one of 12 priority categories for Nestlé UK's responsible sourcing activities, focusing on traceability. Procter & Gamble provides information on the scale of its operations and reports that it has conducted a supplier evaluation, however there is no mention of raw materials. Reckitt Benckiser's statement includes a case study on its efforts to

improve palm oil traceability and its plan to conduct human rights due diligence, but general information on its supply chain is not provided.

All five companies acknowledge in other documents (to varying degrees) that in some countries palm oil production is associated with labour rights and human rights abuses, and all express their commitment to tackling the issues. We found two company policies specifically related to palm oil (Kellogg and Colgate), while Nestlé has a Commitment on Labour Rights in Agricultural Supply Chains.

Kellogg Company

Kellogg is an American multinational food manufacturing company. Well-known UK brands include breakfast cereals and Pringles. It is listed on the New York Stock Exchange and reported net sales of \$13.5 billion in 2016.⁸²

Slavery and Human Trafficking Statement

A footnote to a document titled 'Kellogg Company Policy Statement Prohibiting Involuntary Labour' and dated 6 May 2016 states, 'This policy statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act and the California Transparency in Supply Chain Act. It constitutes Kellogg Company's anti-slavery and human trafficking statement / disclosure and policy for the financial year ending December 31, 2015.⁸³ The document's format – a scanned pdf – means that the web links to other company policies are not functional. Available at https://www.kelloggcompany.com/content/dam/kelloggcompanyus/corporate_responsibility/pdf/2016/Kellogg%20Company%20Policy%20Statement%20Prohibiting%20Involuntary%20LaborMay2016.pdf Dated 2 June 2016.

The statement briefly describes the scale of the company's operations. Kellogg makes clear that it is committed to maintaining an ethical and transparent supply chain, free of involuntary labour, but the statement provides no overview of its supply chain. The company reports that it takes a risk-based approach to determine which suppliers need additional education on responsible sourcing issues, or require additional verification of adherence to company policies. The statement says that over ten years ago, Kellogg undertook a risk assessment for worker and human rights within its supply chain which determined that premium suppliers (those that supply small gifts and prizes included in the company's products) had the highest ethical and social risks. There is no specific information relating to risks arising from raw materials sourcing. The statement mentions updates made to Kellogg's Supplier Code to expressly forbid the use of involuntary labour and its future plans for supplier engagement and risk assessment.

The statement does not describe the company's human rights due diligence process or mention engagement with workers or producers.

Other relevant information available on the company's website

Kellogg's Global Sustainable Palm Oil Policy⁸⁴ acknowledges that 'The rapid expansion of palm oil production has been associated with human rights violations...' The policy states that the company is '...committed to working with our global palm oil suppliers to source fully traceable palm oil to known and certified sources that are environmentally appropriate, socially beneficial and economically viable...' in adherence with a set of principles including the respect and recognition of the rights of all workers regardless of gender, including contract, temporary and migrant workers, and the prohibition of forced and child labour, and human

trafficking. The policy includes an Implementation Plan which says that through its Global Supplier Code of Conduct the company will require suppliers to commit to ethical business practices and respect for human rights. Kellogg states that if a supplier violates the Global Supplier Code of Conduct and Global Palm Oil Policy, it will engage suppliers and partners to remediate the violation and if the issue is not resolved, will take action to remove the supplier from the supply chain through suspension or exclusion.⁸⁵ The Palm Oil Policy includes a link to Kellogg's 2017 Global Palm Milestones, which provides details of Kellogg's suppliers, an overview of those suppliers' own policies, and Kellogg's engagement with suppliers 'to address grievances'. Details of the grievances are not provided, however in the reference to Wilmar, Kellogg mentions Amnesty International.

Kellogg's Supplier Code of Conduct includes a section on labour rights stating that 'Suppliers must not use or facilitate any type of involuntary labor, including forced, indentured, bonded, slave or human trafficked labor'. The Code also includes provisions on child labour, fair wage and working time, right to organise and work documentation.⁸⁶ Information on the supplier code and Kellogg's use of Sedex self-assessments and third-party audits to address human rights risks are also included in its 2016/17 Corporate Social Responsibility Report.⁸⁷

Colgate-Palmolive

Colgate-Palmolive is an American multinational which manufactures personal hygiene products. The company is listed on the New York Stock Exchange and reported net sales of \$15.2 billion in 2016.⁸⁸

Slavery and Human Trafficking Statement

A document titled 'Colgate-Palmolive Company Respecting Human Rights and Labor Rights: Disclosure Statements' (available on a web page headed 'Procurement Policies') includes this sentence: 'This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Colgate-Palmolive Company's anti-slavery and human trafficking statement for 2016.'⁸⁹

Colgate reports that it sources goods and services from over 39,000 suppliers located in over 100 countries. Its Third Party Code of Conduct sets out its expectations of suppliers and business partners on a range of issues including labour practices and human rights. Suppliers are expected to apply the policy across their entire operations and Colgate's policy is not to work with any supplier or contractor known to utilise inhumane labour practices including involuntary labour.

A list of additional policies includes 'Policy on Responsible and Sustainable Sourcing of Palm Oils'. The company reports that through the development of its human rights strategy, salient issues were identified along with the vulnerable groups that may be most impacted by these issues. These groups include individuals working in high-risk geographies or industry sectors where human rights abuses are most common, particularly with migrant or temporary workers and other groups who may be directly impacted. The company says that it has assessed more than 75 per cent of its spend with direct material suppliers operating in high-risk geographies, including raw material suppliers, however it is unclear if this currently includes palm oil, as the company lists in the 'Future Plans' section of the statement its intention to expand responsible sourcing assessment further into direct materials including mined and agricultural materials.

Other relevant information available on the company's website

Pages 107-110 of Colgate's Corporate Social Responsibility and Sustainability Report 2016 addresses deforestation and include a section on palm oil, noting that over 85 per cent of the world's palm oil comes from Indonesia and Malaysia, '...where land is sometimes converted from forest to palm plantations, resulting in social and labor concerns...'. Colgate sets out its commitment to build a traceable supply chain with no exploitation of indigenous people, local communities or workers, and says that it began to map its supply chain and identified all palm oil derivatives in its supply chain in 2015. It is requesting information on traceability to the mill level from all direct suppliers of palm oil, palm kernel oil and derivatives, with a commitment to procure 100 per cent certified palm oil and palm kernel oil and the goal of achieving full traceability to the plantation/source by year-end 2020.⁹¹

The Policy on Responsible and Sustainable Sourcing of Palm Oils requires suppliers at all tiers to commit to no child or forced/bonded labor and no unethical recruitment practices in its supply chain. The policy states that suppliers will be compliant with all relevant laws and regulations and additionally commit to working conditions, health and safety, hours and wages that are in accordance with International Labour Organization standards. Written contracts, where required by law, will be provided to all workers in a language that they understand, detailing the nature of the work, rate of pay and pay arrangements, working hours, vacation and other leave, and other benefits of employment. Freedom of association and right to collective bargaining will also be guaranteed. The policy states that Colgate expects RSPO suppliers to publish concession maps where legally permissible and will encourage suppliers to publicly disclose their refiner and mill sources.⁹²

In response to Amnesty International's report on palm oil abuses,⁹³ Colgate issued a statement saying that 'We have made clear that continued supply will be contingent on Wilmar systematically addressing the human rights issues.'⁹⁴

Nestlé UK

Nestlé UK is a wholly-owned subsidiary of the world's largest food and beverage company, headquartered in Switzerland. Brands include San Pellegrino, Rowntree's and SMA Nutrition (infant formula). The company is listed on SIX Swiss Exchange and reported sales worth CHF 89.5 billion (approx. \$92 billion) in 2016.⁹⁵

Slavery & Human Trafficking Statement

Available at http://www.nestle.co.uk/asset-library/documents/39506_nestle_mod-slave-act_ab_30sep.pdf. Dated 30 September 2016.

Nestlé acknowledges that exposure to modern slavery and human trafficking is much higher in its upstream supply chain than anywhere else in its business activities and comments that eliminating forced labour from agricultural supply chains requires strong collaboration between all relevant actors, with national governments taking the lead. Nestlé articulates its ambition to be exemplary in respecting good labour practices.

Describing its supply chain, the company says that it sources raw materials from more than 4.1 million farmers, including 760,000 smallholders. It recognises that the risk of modern slavery and human trafficking is greatest to rights holders in its supply chain and says that across the UK businesses, it is in the process of mapping its entire supply chain, including co-manufactured and imported products.

The company lists 11 salient human rights risks, the top seven of which relate to labour rights issues. Child labour is listed sixth, forced labour seventh, and both are identified as affecting suppliers, farmers and farm workers. Nestlé reports that it has developed a number of policies including Nestlé Commitment on Labour Rights in Agricultural Supply Chains to explicitly address human rights issues in some of its global agricultural supply chains, including forced and bonded labour. A roadmap for implementation is currently being developed.

Nestlé describes the eight elements of its human rights due diligence program and the mechanisms it uses to monitor compliance with its standards.

Palm is one of 12 priority categories for Nestlé UK's responsible sourcing activities, focusing on traceability. It reports that by the end of 2015, 54 per cent of the total volume of the 12 priority categories was traceable (against a global target of 40 per cent). Of this traceable volume, 43 per cent was responsibly sourced (against a global target of 30 per cent). Its target for 2016 is to achieve 50 per cent of the volume of 12 priority categories to be traceable. In the section of the statement covering future commitments, the company says that it aims by the end of 2018 to undertake child labour risk assessments for all 12 high-priority categories of raw ingredients.

Other relevant information available on the company's website

In its 2015 'Nestlé in Society' report the company records that it purchased palm oil from processing companies that source from Malaysia, Indonesia and other countries. The company requires suppliers to source from plantations that comply with the RSPO principles and criteria, but says that there has been a lack of information in the palm oil supply chain and provides information on how it has attempted to address this, stating that it has made 'some progress' engaging with major suppliers including Wilmar. Its 2015 total purchased volume globally was 420,000 tonnes (around 1 per cent of the global total), 90 per cent of which was traceable and 47 per cent of which was responsibly sourced. Nestlé describes how since 2010 it has used RSPO GreenPalm certificates to offset palm oil purchasing, however it says that this was '...a temporary solution while we identified palm oil origins and started to assess and help remediate the root causes of deforestation and poor labour conditions', and began to phase out the use of the certificates in January 2015. In a description of a palm oil study tour to Indonesia, Nestlé recognises that the challenges in the palm oil supply chain include labour practices on plantations.⁹⁶ In the Responsible Sourcing section of its website, Nestlé UK reports that 100 per cent of palm oil bought and used in the UK and Ireland is independently verified as responsibly sourced and coming from a fully segregated supply chain.⁹⁷

Nestlé's Supplier Code covers all suppliers it does business with, their parent, subsidiary or affiliate entities, as well as all others with whom they do business including all employees (including permanent, temporary, contract agency and migrant workers), upstream suppliers and other third-parties. The Code says that suppliers must not use or benefit from forced labour and the use of child labour is prohibited. Wages must comply with national laws or industry standards, whichever is higher. Suppliers are required to '...be capable to disclose all the potential sources of primary origins (country of origin) associated with deliveries made. Nestlé reserves the right to ask the supplier to create full supply chain mapping back to origin to facilitate assessment of upstream supply chain compliance.'⁹⁸ An appendix to the Supplier Code, Nestlé Commitment on Labour Rights in Agricultural Supply Chains describes its commitment '...to working with suppliers to ensure that working conditions throughout their supply chains (both their direct labour force, as well as third party contractors) comply with

applicable laws and industry norms...[and] to raise low wages...' Further commitments include stakeholder engagement and advocacy and progress reporting.⁹⁹

Nestlé's Responsible Sourcing Guideline reiterates the prohibition on the use of forced labour and child labour. The section on palm oil applies to all countries and all production scales (e.g. large estate through to smallholder production). Suppliers are expected to verify that the palm oil they supply complies with the RSPO Principles and Criteria.¹⁰⁰

Procter & Gamble UK

Procter & Gamble UK is part of the Procter & Gamble group, an American multinational consumer goods manufacturer that owns brands including Ariel, Fairy, Olay and Pantene. The company is listed on the New York Stock Exchange and reported net sales of \$65.3 billion in 2016.¹⁰¹

Slavery & Human Trafficking Statement

Available on homepage at <http://www.pg.co.uk/>. Dated 8 September 2016.

The statement provides an overview of the Group's operations and reports that it works with approximately 80,000 suppliers across its supply chain. It sets out the company's commitment to ensuring that no modern slavery or human trafficking is taking place in its supply chains or in any part of its business. The company states that it has in place systems to assess, monitor and mitigate risk and that as part of this, every three years it evaluates suppliers and identifies high-risk suppliers on a number of parameters including known risks and country location; high risk suppliers are audited biennially. No further detail is provided and there is no specific reference to palm oil source countries and risks in the statement.

Other relevant information available on the company's website

P & G's Sustainability Guidelines for External Business Partners (linked from statement) prohibit the use of child labour and state that employment must be voluntarily and freely chosen. The company's Palm Oil Policy acknowledges that 'In some regions of the world, the rapid expansion of palm oil production has...resulted in some incidents where the rights of workers and indigenous peoples have been infringed.' Through the policy, the company commits to respect for human and labour rights, and outlines a number of actions relating to traceability and preventing deforestation.¹⁰²

In its Palm Oil FAQs, P & G discloses that it sources the majority of its palm-derived material from Malaysia, with the rest coming from Indonesia and unnamed countries in central/South America. It says it is working with suppliers to drive traceability through the entire supply chain, first to supplier mills and then to the source plantations.¹⁰³

Reckitt Benckiser

Reckitt Benckiser Group plc (RB) is a British multinational consumer goods company headquartered in Slough, England. Brands include Dettol, Scholl and Nurofen. RB is a FTSE 100 company and reported net revenue of £9.9 billion in 2016.¹⁰⁴

Slavery & Human Trafficking Statement

Available at https://www.rb.com/media/2649/27240-rb-modern-slavery-statement_final.pdf. Undated.

RB's statement includes an introductory paragraph from its CEO outlining a no-tolerance approach to modern slavery and trafficking. The company provides an overview of its operations, but simply states that it sources from 'a range of suppliers'. In a discussion of risk identification, RB says that the following supplier groups were identified as being high risk and in need of further due-diligence: third-party manufacturers, distribution centres and selected raw and packaging material suppliers, predominantly located within its Developing Markets area - Latin America, Middle East, Africa, North and South Asia. Through supply chain audits to date, the company reports having identified 1,349 non-compliances with its requirements: of the issues identified, 82 per cent are reported as closed. No specific incidents of child or forced labour were identified.

A short case study describes the company's efforts to trace palm oil derivatives back through the supply chain to the mill. In 2015 it achieved traceability to mill for 70 per cent of palm oil volumes (excluding surfactants). It also conducted on-the-ground compliance assessments at selected mills for all key suppliers. It plans to increase its human rights due diligence with the help of a specialist consultancy to support further assessments focused on human rights within its palm oil supply chain.

Other relevant information available on the company's website

RB's approach to responsible palm oil sourcing 2016 notes that production of palm oil has been linked to human rights abuses and poor labour and safety practices. The company states its commitment to zero exploitation of workers or communities and its expectation that suppliers comply with its standards. It acknowledges that to complete its due diligence, it must know where its palm oil comes from, and as a consequence has focused on tracing the product back to the mill. Source countries are not mentioned, other than a brief reference to the particular difficulties of traceability in India. A process of on-the-ground reviews to assess priority supplier compliance with company standards results in an action plan and follow-up assessments to review progress. RB says it is committed to collective action with others in the industry to address common issues.¹⁰⁵

In its Policy on Human Rights & Responsible Business - Detailed Requirements, RB prohibits the use of child labour and forced labour at its own and its suppliers' facilities. Suppliers' failure to comply may result in requirement for immediate audit and/or remediation and potentially the immediate termination of RB's business relationship with that supplier. In the same document under the heading Collective Bargaining and Freedom of Association, the policy states 'The company shall strive to provide adequate and acceptable working terms and conditions for employees so that employees do not feel the need to seek union protection to obtain better terms and conditions.' It goes on that joining trade unions will not result in any negative consequences.¹⁰⁶

5. Tea from Assam

Tea from Assam in Northeast India is an essential ingredient in the standard English Breakfast blend that millions of people drink every day. There are approximately 800 tea plantations and 100,000 smaller tea gardens in Assam, producing 52 per cent of tea in India and almost one-sixth of world tea.

A BBC investigation in 2015 found dangerous and degrading living and working conditions in Assam tea estates supplying major brands and retailers.¹⁰⁷ Low wages and poor working and living conditions on the plantations have resulted in malnutrition making tea workers and their families vulnerable to disease, with investigations also revealing serious human rights abuses including human trafficking. Housing provided to workers is in poor condition with inadequate sanitation and reports of lack of electricity. A 2014 Guardian report made allegations of human trafficking in Assam.¹⁰⁸

The current minimum wage in Assam is Rupees 126 (£1.45) per day. The low wages paid are considered to be a contributing factor to human trafficking on estates. In July 2015 the Government of Assam proposed this be revised to Rs. 177 (£2.03), consisting of a cash wage of Rs. 143 and other benefits, but in September that year, a group of tea plantation owners filed a court case with the aim of blocking the wage increase.

UK tea companies and retailers have particular leverage as major players in the global market, with both Unilever and Tata-Tetley having 10-20 per cent of global market share. In June 2016, civil society organisations wrote an open letter to brands and retailers purchasing Assam tea attending the TEAM UP 2016 conference on tea and sustainability, emphasising that further work is needed to improve wage levels of tea workers in Assam, particularly in light of the risk of slavery and reported instances of human trafficking in the sector and from the region.¹⁰⁹

Summary analysis of company statements and other publications

We found statements from all companies except Fortnum & Mason. Bettys & Taylors recognises black tea sourcing as inherently high risk and notes that there have been documented incidents of trafficking in Assam. The Tata statement makes no specific reference to India or Assam and no substantive information is provided on risks and due diligence. Typhoo notes that many of its source countries have incidents of human rights abuse, but no detail is provided. Unilever's statement says that the company has identified forced labour as one of eight salient human rights issues and that it is working to improve conditions for tea estate workers and their families. Assam is not referred to. Unilever reports that it works directly with suppliers to help identify risks and remediate gaps in practice.

In its 2015 CSR Report, Fortnum and Mason states that all its teas from India are sourced from estates and producers participating in and adhering to Ethical Tea Partnership standards. It sets out standards for suppliers and says that buyers make due diligence visits based on risk assessments. Assam is not specifically mentioned.

The Tata Global Beverages website includes a section detailing the company's response to allegations of labour and human rights abuses on tea gardens in Assam owned by Amalgamated Plantation Private Limited (APPL), in which Tata is a shareholder.

Unilever provides a brief overview of a 2016 social footprint mapping exercise of its tea supply chain. The company's 2015 Human Rights Report addresses its salient human rights issues and notes that low minimum wages are an issue in many countries where tea production takes place. A number of case studies are provided relating to tea producing countries, but Assam is not covered. Unilever's Responsible Sourcing Policy and Sustainable Agriculture Code address labour rights issues in detail.

Bettys & Taylors Group

Bettys & Taylors Group is a tea and coffee merchant. The company blends Yorkshire Tea, the third best-selling tea in the UK. It reported £150m revenue in 2015.¹¹⁰

Slavery and Human Trafficking Statement

Available here <https://www.bettysandtaylors.co.uk/wp-content/uploads/2017/03/2016-Modern-Slavery-Statement.pdf>. Dated 6 March 2017.

The company reports that it sources tea and coffee from 24 countries across Africa, Asia, Central and South America, and estimates that its global tea and coffee supply chain touches around a million farmers and workers. The statement categorises black and speciality tea sourcing as inherently high risk and notes that 'Documented incidences of trafficking within high risk groups in some geographies we trade with, primarily North India (Assam and Darjeeling) is a significant residual risk.' The company seeks to address these risks by sourcing all tea from third party certified estates and to ensure supplier compliance against the Ethical Trading Initiative (ETI) Base Code. The company describes its approach to sourcing tea as being based on a direct relationship model that supports long-term forward supply contracts, high levels of supply chain transparency and regular face-to-face contact with strategic suppliers.

Other relevant information available on the company's website

The Group's 'Commitment to Ethical Trading' outlines commitments to ensuring its supply chain meets International Labour Standards and to paying sustainable prices¹¹¹ and its Anti-Slavery and Human Trafficking Policy sets out a zero tolerance stance and an expectation that suppliers uphold the company's standards.¹¹²

Fortnum & Mason

Fortnum & Mason is a luxury retailer with shops in London and Dubai. It is privately owned by Wittington Investments Ltd, a British company. The company reported turnover of over £98.7 million for the year ended 10 July 2016.¹¹³

Slavery and Human Trafficking Statement

No statement could be found on the company's website or on the Modern Slavery Registry.

Other relevant information available on the company's website

In its 2015 Corporate Social Responsibility report Fortnum & Mason states that all Fortnum & Mason teas from India and China are sourced from tea estates and producer groups participating in and adhering to Ethical Tea Partnership (ETP) standards. Under the 'Supply Chain Engagement' section, the report states 'Fortnum & Mason is committed to ensuring that there is no slavery, human trafficking or child labour in our supply chains. To this end, we have commenced a programme whereby we clearly set out to suppliers the expectations we have for our business partners. We also require our suppliers to set out their employment, remuneration and welfare policies. Based on a risk assessment, these will be scrutinised during due diligence visits by our buyers.'¹¹⁴

Tetley (Tata Global Beverages)

Tetley became a wholly-owned subsidiary of India-based Tata Global Beverages in 2000. Tata is the second largest tea company in the world. The group reported consolidated revenue of Rs. 6780 Crs for financial year 2016/17.¹¹⁵

Slavery and Human Trafficking Statement

Available at http://www.tataglobalbeverages.com/docs/default-source/Investor-Governance-Policy-/tgb-gb_slavery-and-human-trafficking-statement-2015-16.pdf?sfvrsn=8. Dated 30 June 2016.

The statement says that the vast majority of raw tea used to produce Tetley Tea is sourced from Africa, with the rest from 'various countries around the world'. There is no specific reference to India or Assam. No substantive information is provided on risks and due diligence. The company states that it is aiming for all its purchased black tea to be Rainforest Alliance certified by the end of 2016, and provides information on its membership of the Ethical Tea Partnership.

Other relevant information available on the company's website

The company states on its website that 'we are committed to sourcing 100% of our black teas from Rainforest Alliance Certified farms for all our Tetley-branded teas in the EMEA (Europe, Middle East and Africa) and CAA (Canada, America and Australia) regions by 2016. More than 50% of Tetley tea worldwide now comes from Rainforest Alliance Certified farms. As part of our sustainable sourcing strategy, we want to help create a sustainable global tea industry, and working closely with specialist organisations, such as Rainforest Alliance, is an effective way of achieving this.'¹¹⁶

The Tata Global Beverages website includes a section detailing the company's response to allegations of labour and human rights abuses on tea gardens owned by Amalgamated Plantation Private Limited (APPL), in which Tata is a shareholder. The company states that it is committed to the fair and ethical treatment of people across its supply chain and says it is working with APPL to improve plantation workers' living conditions.

Typhoo

Owned by Apeejay Surrendra Group, an Indian business conglomerate, Typhoo Tea Ltd. is the third largest producer of tea in the UK. In 2015 the company reported revenue of £87 million.

Slavery and Human Trafficking Statement

Available on the homepage at: <http://typhoo.co.uk/>. Not dated.

The company's statement says that its tea is sourced from over 15 countries and purchased through public and private auction from suppliers on an approved list. A pie chart in the statement indicates that Typhoo sources between one-sixth and one-fifth of its tea from India. It says, 'Many of the producing countries that we source from have well publicised incidents of abuse of human rights and labour laws', however Assam is not specifically mentioned. The statement partially addresses how the company mitigates these risks for example by requiring suppliers to undergo a risk assessment and requiring their top 140 tea suppliers to

be accredited by ETP/Fairtrade/Rainforest alliance. The company does not describe its human rights due diligence programme but lays down plans for the end of the 2016/2017 financial year.

Other relevant information available on the company's website

On the Sustainability page of the website Typhoo says that it was one of the first tea companies to send buyers to monitor various aspects of life on the tea estate. It commits to working closely with its supply chains to prevent modern slavery and human trafficking and to publish a progress report in each fiscal year as a responsible company.¹¹⁷

Unilever

Unilever is a Dutch-British consumer goods company which owns tea brands including Brooke Bond, Lipton's, Lyons and PG Tips. In 2016 the company reported revenue of €52.713 billion¹¹⁸ Unilever is a FTSE 100 company.

Slavery and Human Trafficking Statement

Available at https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2017_tcm244-498073_en.pdf. Dated January 2017.

In an introduction to the statement, Unilever's CEO acknowledges the risk of forced labour occurring in global supply chains and writes that the company knows there is more it can do to strengthen its process and oversight. The company reports that it has identified forced labour as one of eight salient human rights issues. It has set a target of sourcing 100 per cent of procurement spend in line with its Responsible Sourcing Policy by 2020.

The statement says that in addition to paying particular attention to specific groups of vulnerable people, the company aims to address human rights issues in high-risk commodities and geographies. It continues:

'We believe that more must be done to improve conditions for tea estate workers and their families through working together with partners and others in the industry. The strengthening of certification models, particularly regarding labour rights and working conditions, is a key part of the solution. We continue to work with the Rainforest Alliance to make improvements. We are also aware that tea communities face issues such as human trafficking and we are reviewing how we can best work with others to address this.'

There are no specific references in the statement to Assam.

Unilever uses a scoring system to assess the risk level of particular suppliers, and procurement managers work directly with suppliers to help identify risks and remediate gaps in policies and practice. The company reports that it has 76,000 suppliers but further detail is not provided.

Other relevant information available on the company's website

The webpage 'Understanding our human rights impacts' provides an overview of a 2016 social footprint mapping exercise of Unilever's tea supply chain. The company states 'By considering the level of traceability we have for each sourcing location, the human rights risks in each

of these locations and the procedures we have in place to respond to identified risks, this initial risk mapping exercise gave us a better understanding of our operational risks and opportunities.' No further detail is provided.¹¹⁹

Unilever's 2015 Human Rights Report addresses each of the company's salient human rights issues. Under wages, the report says 'Many countries where tea production takes place are poor with low minimum wages', and gives details of the company's engagement in a multi-stakeholder process to address the issue in Malawi. Under 'Harassment' details are provided on a programme to address sexual harassment on Unilever's tea plantation in Kenya. The report also includes an assessment of the tea supply chain in Turkey, in relation to migrant workers' rights. No information is provided on Assam.¹²⁰

Unilever's 2017 Responsible Sourcing Policy sets out 12 fundamental principles anchored in international standards; nine of the 12 relate to labour rights. The policy describes mandatory requirements, disclosure and reporting requirements and measures for continuous improvement.¹²¹

The Unilever Sustainable Agriculture Code prohibits the use of child labour and forced labour, and payment in return for employment. Provision of accommodation and food for workers must not be deducted from wages without workers being given a choice as to whether to accept these benefits, and evidence of prior consent is required. Wages and working hours must comply with all applicable legislation, as a minimum.¹²²

III. AT-RISK SECTORS

1. Premier League Football Clubs

In a speech in the House of Lords on 22 June 2017 on modern slavery, Baroness Young of Hornsey explained: ‘...I have been trying to engage with the Premier League—it contributes a whopping £3.4 billion to the UK economy—and some of the clubs. Every one of the 20 top-tier clubs should have a modern slavery statement. It is clear that there is quite a wide gap between clubs in the quality of their statements...their activities encompass a whole range of things from garments to...kits, security, stewarding, hospitality, catering, construction, cleaning and IT—all services where there is a risk of hostile labour conditions, both here in Britain and overseas. There is also a real opportunity for the English Premier League and the constituent clubs to help raise awareness of forced labour and other abuses in supply chains, as well as to address their own issues. Given that some clubs are clearly struggling to compile their statements and a feasible implementation strategy, which is also the case with some fashion companies, I hope that the Premier League has plans to help raise the bar on this with its member clubs.’

For more information on the risks associated with apparel manufacture, hospitality and construction see relevant sections below.

Summary analysis of company statements and other publications

All five companies have published Slavery and Human Trafficking Statements. Arsenal reports on business operations and risk assessments, but not on its supply chain or on identified risks. Chelsea and Manchester City provide a short overview of their operations and supply chains, and mention risk assessments, however again, identified risks are not listed. Manchester United has established a risk committee whose remit covers compliance with modern slavery laws, while Liverpool reports that it is in the process of mapping its first-tier supply chain to identify and mitigate risks.

We did not find any other relevant publications on the companies’ websites.

Arsenal F.C. (Arsenal Holdings PLC)

Arsenal F.C. is owned by Arsenal Holdings PLC. In 2016 Arsenal Holdings PLC reported revenue of €353.5 million.¹²³

Slavery and Human Trafficking Statement

Available at <http://www.arsenal.com/the-club/modern-slavery-statement>. Dated November 2016.

The statement covers the Group and notes that its business operations include football operations, commercial partnerships, media distribution, ticketing, retail, property development and community projects. The majority of its operations are conducted in the UK through The Arsenal Football Club PLC.

Arsenal PLC reports undertaking ongoing risk assessments considering factors including: the nature of activities, location of activity, the sources from which the company is supplied goods

or personnel, the risk profile of relevant locations, and any other relevant cultural, economic or operational factors. Detail of the findings is not provided.

Suppliers undergo an approval process which involves an assessment of their policies, procedures, processes and values. New suppliers considered to represent a higher risk for the existence of modern slavery are required to satisfy the company that they operate in a manner in which modern slavery is not tolerated, and relevant risks are addressed. Assurances may include appropriate contractual provisions, audits and on-site third party inspections. No further information is provided on the supply chain.

Other relevant information available on the company's website

None found.

Chelsea F.C.

Chelsea is privately owned by Roman Arkadyevich Abramovich. It is listed on the London Stock Exchange and is a constituent of the FTSE 250 Index. It reported turnover of £329.1 million in financial year ending June 2016.¹²⁴ Chelsea F.C. is an accredited Living Wage employer, meaning it pays the Living Wage to both permanent employees and third-party contractors.

Slavery and Human Trafficking Statement

Available at: <http://www.chelseafc.com/the-club/about-chelsea-football-club/modern-slavery-act-statement.html> Dated December 2016.

The statement is made on behalf of the club and its UK subsidiary companies; as well as a football club, it is '...also a multinational business which has broad range of commercial partners, sponsors and suppliers which operate in territories around the world.' Third party suppliers include manufacturers of licensed products and suppliers of merchandise, office equipment, software, food and beverages and maintenance and other services including catering. The club states that '...all persons working for us, and all persons in our supply chain, must comply with this policy.' It reports that it recently carried out a risk assessment to identify areas most at risk from slavery and human trafficking, but no detail is given.

The report says that the club has updated its template licensing agreements, supplier agreements and other standard terms of business to include express terms requiring its counterparties to comply with all applicable laws relating to anti-slavery and human trafficking, to include similar requirements in their own contracts, and to notify the club if they become aware of any slavery or human trafficking in their own supply chains. New suppliers will be required to certify that they are compliant with anti-slavery and human trafficking laws.

Other relevant information available on the company's website

None found.

Liverpool F.C.

Liverpool FC is owned by Fenway Sports Group, a limited liability company. It reported a net income of £301 million in the financial year ending May 2016.¹²⁵

Slavery and Human Trafficking statement

Available at <http://www.liverpoolfc.com/corporate/anti-slavery>. Dated November 2016.

The club says it is in the process of mapping its first-tier supply chain to identify and mitigate risks. The statements say that the club's '...contractual and procurement approach has always been to try and include relevant and binding provisions in our key external supply contracts to ensure our suppliers and our partners trade ethically and take appropriate steps to ensure there is no slavery or trafficking in their business. These protections will continue to be included in all key external supply contracts going forwards.'

Other relevant information available on the company's website

None found.

Manchester City F.C. (City Football Group)

Manchester United F.C. is owned by the City Football Group. In 2016, the company reported revenues of €524.9million. CFG is run as a holding company under parent company the Abu Dhabi United Group for Development and Investment along with Chinese part-owners China Media Capital Holdings and CITIC Capital.

Slavery and Human Trafficking Statement

Available at: <https://www.mancity.com/fans-and-community/club/slavery-and-human-trafficking-statement>. Not dated.

CFG's statement describes its business as football clubs and service companies supporting the main football business. Its supply chain includes securing sponsorship and marketing partnerships, the procurement of IT, media and other services relating to the football and sports industry and the sourcing of raw materials. Additional detail is not provided.

The group reports that where possible it builds long-standing relationships with local suppliers and clearly outlines expectations of business behaviour, as part of its effort to identify and mitigate risk. With regards to national or international supply chains, CFG states that its preferred point of contact is with a UK company or branch which is expected to have suitable anti-slavery and human trafficking policies and processes. No further information is provided on risk identification.

Directors and managers are responsible for compliance in their respective departments and for their supplier relationships and the following KPIs are used: the internal and external audit process; human resource and payroll systems monitoring, including the use of preferred employment agencies; and, direct communication with the supply chain and their understanding of, and compliance with, the company's expectations.

Other relevant information available on the company's website

None found.

Manchester United F.C. (Manchester United Ltd.)

Manchester United F.C. is owned by Manchester United plc. In 2016 Manchester United plc reported revenue of £515.3 million.¹²⁶ Manchester United plc is listed on the New York Stock Exchange.

Slavery and Human Trafficking Statement

Available at: <http://www.manutd.com/~media/AB0D47C8EFC146349B78C89811A6A519.ashx> (dated 19 October 2016)

The company's statement, made on behalf of itself, its UK parent undertakings and its subsidiaries, describes its three principal revenue sections as commercial (sponsorship, retail, merchandising, apparel & product licensing, mobile & content), broadcasting and match day at Old Trafford stadium. The company lists 26 products and services required for its operations.

The company says it had established a risk committee whose remit covers compliance with modern slavery laws. The statement says that the company requires suppliers to provide positive written affirmations that their direct supply chain does not endorse, enable or facilitate slavery or human trafficking in their business operations. It continues that this requirement is being built into new supplier processes and that failure to provide the affirmation can lead to an investigation or termination of contract. No further detail is provided.

Other relevant information available on the company's website

None found.

2. Apparel and Footwear Retailers

Forced labour occurs both in the production of raw materials and during the manufacturing stages of apparel and footwear companies' supply chains, especially at lower tier suppliers and in home-based or informal manufacturing. The textiles, clothing, and footwear industry is growing rapidly, with the number of workers tripling to 60-75 million in 2014 from 20 million in 2000. Around three quarters of these workers are women. Following exposés in the 1990s of dire working conditions in the fashion industry supply chain, multi-stakeholder initiatives were established to improve conditions and most large apparel and footwear companies now operate supplier monitoring systems. Yet while progress has been made, forced labour persists in the sector. The collapse of the Rana Plaza building in Bangladesh, which killed 1200 people proved that auditing systems fall short: two factories in the building had been audited for social compliance and several brands were unaware that their clothes were being made there. Where audits are announced, some employers ask undocumented workers or child workers to hide. "Fast fashion" models can exacerbate the risk of forced labour, with pressure on lead times and pricing leading suppliers to outsource production. Huge pressure to meet orders placed by buyers imposing tight deadlines can result in suppliers using coerced, bonded and child labour.¹²⁷

In other instances, work is subcontracted and poor conditions are displaced to a less visible part of the supply chain. Homeworkers are subcontracted to carry out paid work for businesses or their intermediaries, typically on a piece-rate basis, within their own homes.¹²⁸ Estimates suggest that as much as 60 per cent of garment production, particularly of children and women's clothing, is done by homeworkers in both Asia and Latin America.¹²⁹ Homeworkers face many similar problems to other workers in global supply chains, such as low wages, long hours and health and safety concerns. Although for some homeworking can be a positive choice, the hidden nature of the work, precarious employment status, lack of legal protection and isolation from other workers means homeworkers are often the most exploited workers in the industry. Their situation is often far worse than other workers – wages are often about one third or one quarter of the legal minimum, work is irregular and they usually have no social security or employment rights. Organising to defend rights is even more difficult for homeworkers than for factory workers, and few, if any, codes or audits have led to positive changes in their working conditions.¹³⁰

Summary analysis of company statements and other publications

We found statements from Aldi UK, Lidl UK, Matalan and Sports Direct. The Aldi report states that the company has 3,600 suppliers across 68 countries and that the greatest risk of modern slavery to its business is through its product supply chains. While the company is right to recognise modern slavery as a business risk, it should make a distinction between the risk posed to the business and the risks that the business's operations can pose to human rights. All suppliers of textiles and shoes must provide details of every production facility across their supply chain. Aldi supplements third party audits with its own audits and site visits, and plans to open a Corporate Responsibility office in Bangladesh in 2017 to forge closer relationships with suppliers.

Lidl reports that it has aligned its business policies with internationally recognised labour standards. It sources food and non-food products from over 60 countries and from more than 1,500 suppliers, and has published a list of tier-one production facilities for all its own-brand textiles and footwear on its website. The company applies the Ethical Trading Initiative Human Rights Due Diligence Framework. Lidl reports that its Supplier Code of Conduct specifically prohibits child labour and forced labour and it recognises the limitation of audit in monitoring compliance with the Code. It plans to conduct a business-wide human rights review to

develop a modern slavery action plan within a broader human rights strategy.

Matalan reports that its products are supplied from over 800 factories in 24 countries worldwide, but there is no discussion in its statement of modern slavery risks. The company states that it works with suppliers and their factories to deal with any issues found in audits and to continually raise the level of workers' conditions.

Sports Direct's statement gives no substantive detail on the supply chain or the company's own operations, and no information on identified risks.

Other relevant published information includes Aldi's Social Standards in Production. Lidl's main textile and footwear production sites, including addresses are listed on its website. A page on Sports Direct's website explains that it has worked with two leading supply chain companies in Singapore and South Korea for a number of years and that it relies on both supply companies to inspect the premises of all suppliers. Foot Locker has published a statement in compliance with the California Transparency in Supply Chains Act but this makes no reference to risks, due diligence or labour rights standards.

Aldi UK

Aldi UK is part of the Aldi South Group, a supermarket chain operating across nine countries. The company reported sales of more than £7.7 billion at the end of 2015.¹³¹ Aldi UK is the UK's fifth largest grocer by market share. Aldi is a signatory to the Accord for Fire and Building Safety in Bangladesh.

Slavery and Human Trafficking Statement

Available at: [https://cdn.ALDI-digital.co.uk/RQpDMLD5kN8j\\$N9y6hy4Tw5ewwk.pdf](https://cdn.ALDI-digital.co.uk/RQpDMLD5kN8j$N9y6hy4Tw5ewwk.pdf) Dated 17 May 2017.

Aldi UK reports that it has relationships with more than 3,600 suppliers across 68 countries and says that '...we recognise that the greatest risk of modern slavery to our business is through our product supply chains.' The company says it has a zero tolerance approach to modern slavery and that all suppliers must comply with its Social Standards in Production (see below). The Standards form part of Aldi's standard Terms and Conditions of Purchase and are based on UN standards and ILO Conventions. Suppliers and business partners are required to apply these standards to all sub-suppliers throughout the entire production process. All suppliers are contractually required to provide details of the main production facility or site of manufacture for each product and all suppliers of textiles and shoes to provide details of every production facility they use across their supply chain. Aldi supplements third party audits with its own audits and site visits, and states that if severe identified risks are not resolved it will stop working with the production facility in question. It has a team of Corporate Responsibility specialists based in Hong Kong to conduct audits of supplier facilities across South East Asia and South Asia, and states its intention to open a dedicated Corporate Responsibility office in Bangladesh in 2017 to forge closer relationships with suppliers.

Other relevant information available on the company's website

Aldi's Social Standards in Production set out the company's expectation that its business partners respect workers' rights to freedom of association and collective bargaining and say that it does not tolerate discrimination against workers on the grounds of trade union

membership. Suppliers and business partners must comply with minimum wage legislation or industry standards approved on the basis of collective bargaining, whichever is higher. Child labour and forced labour are prohibited.¹³²

Low wages, limits to workers' freedom of association, and long working hours are identified as issues in the Bangladesh garment industry that Aldi is seeking to address through its Factory Advancement Project.¹³³

Foot Locker

Foot Locker is an American sportswear and footwear retailer. The UK subsidiary, Footlocker UK Ltd reported turnover of £113 million in its annual report for the year ended 31 December 2015.¹³⁴ It is a publicly listed company.

Slavery and Human Trafficking Statement

No Slavery and Human Trafficking Statement could be found on the company's website or on the Modern Slavery Registry.

Other relevant information available on the company's website

Foot Locker's 132-word statement in response to the California Transparency in Supply Chains Act says that it reserves the right to make periodic, unannounced inspections of private label suppliers' facilities and to terminate the relationship with any supplier who fails to comply with its requirements. There is no information on whether the company has taken such action.¹³⁵

Lidl UK

Lidl is a German-headquartered discount supermarket chain owned by Swartz Gruppe. Lidl was reportedly expected to generate a €70 billion turnover in the financial year ending February 2017.¹³⁶ It is a private company. In September 2015 Lidl UK became the first supermarket to pay the Living Wage.¹³⁷ Lidl is a signatory to the Accord for Fire and Building Safety in Bangladesh.

Slavery and Human Trafficking Statement

Available at https://www.lidl.co.uk/statics/lidl-offering-uk/ds_doc/ModernSlaveryStatement2017.pdf Undated.

Lidl reports that it has aligned its business policies with internationally recognised labour standards. It provides a brief overview of its international and UK operations and states that it sources from over 60 countries and from more than 1,500 suppliers, with buying teams based in Lidl UK, at its international headquarters in Germany and across its network of companies based in Europe. Lidl applies the Ethical Trading Initiative Human Rights Due Diligence Framework and uses various information platforms and sources to map all of its own-label suppliers. It has published a list of tier-one production facilities for all its own-brand textiles and footwear on its website. The list currently includes around 600 producers and their addresses, and is updated every six months. Lidl reports that its Supplier Code of Conduct specifically prohibits child labour and forced labour. We could not find the Code on Lidl's website. The company uses audits to monitor compliance with the Code, however it

comments: 'We appreciate the limitations of third-party auditing in promoting decent work and protection of rights in our supply chains, especially in relation to 'hidden' activities such as labour exploitation. We, therefore, place a strong emphasis on root cause analysis, ensuring we build strong long-lasting trading relationships with our suppliers.' Lidl's future plans include: conducting a business-wide human rights review to develop a modern slavery action plan within a broader human rights strategy; developing a labour provider policy on tackling modern slavery; and defining clear KPIs to assess the effectiveness of its approach.

Other relevant information available on the company's website

Lidl's main textile and footwear production sites are listed at: <https://www.lidl.co.uk/en/Textile-and-footwear-production-sites-8384.htm> Suppliers from 25 countries are included in the list.

Matalan

Matalan is a British fashion and homeware retailer, owned by parent company Missouri Topco Ltd. Missouri Topco's accounts for the financial year ending 25 February 2017 report operating profit of £46.1 million.¹³⁸ Matalan is a signatory to the Accord for Fire and Building Safety in Bangladesh.

Slavery and Human Trafficking Statement

Available at <https://www.matalan.co.uk/corporate/modern-slavery-act-statement> Dated 22 August 2017.

The company states that it supports the International Declaration on Fundamental Principles and Rights at Work. It reports that it employs 15,000 people in the UK and that its products are supplied from over 800 factories in 24 countries worldwide. Source countries are not listed and there is no discussion of modern slavery risks.

Matalan reports that its suppliers, their factories and any associated third party partners within its supply chain are required to comply with its Anti-Slavery and Human Trafficking Policy, and that all new contracts with franchise partners and key suppliers of services include contractual obligations to comply with the policy. The policy could not be found on the company website.

The company reports that all supplier factories are audited annually, that unannounced inspections take place where areas of higher risk are identified and that it works with suppliers and their factories to deal with any issues found on audits and to continually raise the level of workers' conditions. New suppliers must identify all the factories they use and provide a third party audit report in relation to each of these.

Other relevant information available on the company's website

None found.

Sports Direct

Sports Direct International plc is the UK's largest sports-goods retailer and the owner of a range of sport and fashion brands. The company reported sales of £2.9 billion in 2016.¹³⁹ It is a publicly listed company.

Slavery and Human Trafficking Statement

Available at <http://www.sportsdirectplc.com/corporate-responsibility/community.aspx> Dated 22 September 2016.

The company reports that its supply chain includes buying agents, shipping partners, licensees and a manufacturing facility. No further detail is provided. It states that it has a framework in place to highlight potential areas of risk in its supply chain, but the statement provides no information on identified risks.

Other relevant information available on the company's website

Sport Direct states that it has a strict Code of Conduct that it requires every supplier to adhere to. The Code of Conduct provides for the fair treatment of workers, ensuring a safe environment in accordance with 'local and national' laws and that workers are treated with respect and paid fairly for what they do. The Code of Conduct also prohibits child labour and the use of illegal means or materials in the production of goods. The Code could not be found on the company's website.

Sports Direct reports that approximately 40 per cent of current suppliers have worked with the company for 10 years or more and that it has worked with two leading supply chain companies in Singapore and South Korea for a number of years. Sports Direct relies on both supply chain companies to inspect the premises of all suppliers and manufacturers and states that frequent inspections are carried out randomly to ensure that goods meet quality standards as well as assessing continued compliance with SA8000 and its own Code of Conduct. The company ceases immediately to work with suppliers who do not meet its criteria.¹⁴⁰ No further information is provided.

3. Hotels and Accommodation*

Hotels, catering and tourism is one of the fastest growing sectors of the global economy. While its labour-intensive nature creates a high number of jobs, it has a reputation for poor working conditions due in part to low wages, low skill requirements, shift and night work, and seasonality.¹⁴¹ In some countries average hours of work in hotels and restaurants are significantly higher than in other sectors of the economy, while wages can be up to 42 per cent lower.¹⁴²

The use of multi-tier recruitment systems combined with the layered structure of hotels, which often involves brands franchising their properties, can mean that unscrupulous practices are difficult to detect.¹⁴³ In the UK, exploitative practices can be found throughout the hospitality industry and are particularly apparent when workers are recruited via agencies and in outsourced operations, a common practice in the industry. Despite efforts by some in the sector to improve worker protection, agencies supplying services and workers to the industry remain subject to less vigorous enforcement of employment regulation than in some other sectors, for instance agriculture and food processing. Such governance gaps inevitably create a difficult operating arena for business, with law-abiding, efficient business being undercut by unscrupulous and illegal operators.¹⁴⁴

Much of the workforce recruited into the industry by agencies is made up of migrant workers who are vulnerable to exploitation in both recruitment and employment practices. Lack of knowledge about employment rights, limited language skills and little or no access to training and support networks can place migrant workers at particular risk of abuse. Debt bondage arising from excessive recruitment fees, debt servicing and wage deductions can entrap migrant workers within circles of abuse. These factors mean that migrants, along with other vulnerable workers, frequently lack the leverage or knowledge that would allow them to assert their basic rights.¹⁴⁵

Workers in supply chains providing goods and services purchased by hotels, such as food and linen can also be at risk.¹⁴⁶

**For the purposes of this report, we have included Airbnb in this section. Like every company, Airbnb faces risks of modern slavery and human trafficking occurring in its operations and supply chain, and some of these risks are the same as those facing traditional hotels. While people hired to carry out activities associated with the renting-out of properties listed on Airbnb (such as cleaning) are at a risk of exploitation in the same way as other people undertaking similar work, it remains an open question whether Airbnb properties (which are not owned or managed by the company and are simply listed on its website) should be considered as being within the company's operations and supply chains. Based on the available financial information, the company is within the scope of the Modern Slavery Act reporting requirement.*

Summary analysis of company statements and other publications

Every company with the exception of Airbnb has published a statement. All companies provide a brief overview of the scale of their operations (number of properties, number of countries in which they are operate) but only IHG provides any information on its supply chain. Multinational hotel groups successfully apply brand standards throughout franchises but statements provide only vague information on how franchisees' adherence to human rights standards is ensured. IHG is the only company to provide details on identified risks, while the other companies simply report that they have conducted human rights impact assessments or risk assessments, without disclosing the findings. Marriott and IHG include information in their statements on vendor/supplier codes of conduct.

In the 'Risks' section of its Annual Report 2016 Form 10-K, Hilton states that 'Collective bargaining activity could disrupt our operations, increase our labor costs or interfere with the ability of our management to focus on executing our business strategies...Increased unionization of our workforce...could disrupt our operations, reduce our profitability or interfere with the ability of our management to focus on executing our business strategies.' Similar wording is included in Hyatt's Form 10-K. Freedom of association and effective recognition of the right to collective bargaining are among the eight ILO Fundamental Conventions.¹⁴⁷ In its Q&As on business and collective bargaining, the ILO notes: 'Freedom of association and the exercise of collective bargaining provide opportunities for constructive rather than confrontational dialogue, and this harnesses energy to focus on solutions that result in benefits to the enterprise, its stakeholders, and society at large.'¹⁴⁸ By categorising collective bargaining as a risk to their businesses, Hilton and Hyatt are potentially limiting these opportunities, and may even inadvertently be placing limitations on the right to organise.

Marriott, Hyatt and IHG publish their codes of conduct, with the latter two including provisions on respecting employees' right to freedom of association.

Airbnb

Airbnb is a global rental accommodation platform. The company is privately listed and limited information is available about its financial position, however according to media reports Airbnb's 2015 revenue was just under \$900 million and it is predicted to make a profit of \$3.5 billion by 2020.¹⁴⁹

Slavery and Human Trafficking Statement

No Slavery and Human Trafficking statement could be found on the company's website or on the Modern Slavery Registry.

Other relevant information available on the company's website

While the company website contains a policy section with information on Airbnb's standards and expectations¹⁵⁰ and its non-discrimination policy there is no information on risk analysis and prevention of modern slavery or human trafficking.¹⁵¹

A general statement to host users on the Standards section of the company's website states: "You should not commit physical or sexual assault, sexual abuse, domestic violence, robbery, human trafficking, other acts of violence, or hold anyone against their will."¹⁵²

Hilton

Hilton Hotels & Resorts is publicly listed on the New York Stock Exchange and is estimated to have a brand value of more than \$7.8 billion.¹⁵³

Slavery and Human Trafficking Statement

Available at <http://ir.hilton.com/~media/Files/H/Hilton-Worldwide-IR-V3/committee-composition/slavery-and-trafficking-statement-2017.pdf>. Dated April 2017.

Hilton Worldwide Holdings Inc. includes 14 brands, comprising of over 4,900 properties in 104

countries. Franchise owners have full control over the operations of franchised hotels but are required to operate under Hilton's system standards. The supply chain consists of suppliers who sell goods and services to the hotels. No specific details are provided.

The company states that in 2014 it completed a global human rights impact assessment across its business activities which included an assessment of risks in the area of modern slavery and human trafficking, and that it also conducts risk-based reputational due diligence within its hotel ownership and supply chains. Stakeholder engagement is not mentioned in the description of the risk assessment and the findings are not included in the statement.

Hilton reserves the right to conduct unannounced audits and inspections of key suppliers' facilities and in the UK, it requests that suppliers providing employment services conduct an ethical audit with a third-party auditor and/or desktop reviews, and that they implement any suggested action items. In 2016, it launched a working group to expand this approach to other countries of operation, primarily in the Middle East. It reports that it is working with the International Tourism Partnership towards increasing hotel owners' awareness of the risks associated with the conditions of recruitment, work and accommodation for construction site workers. No further detail is given.

There is no reference to labour rights in the statement.

Other relevant information available on the company's website

In its Annual Report 2016 Form 10-K, Hilton states:

Collective bargaining activity could disrupt our operations, increase our labor costs or interfere with the ability of our management to focus on executing our business strategies...Labor regulation and the negotiation of new or existing collective bargaining agreements could lead to higher wage and benefit costs, changes in work rules that raise operating expenses, legal costs and limitations on our ability or the ability of our third-party property owners to take cost saving measures during economic downturns...Increased unionization of our workforce, new labor legislation or changes in regulations could disrupt our operations, reduce our profitability or interfere with the ability of our management to focus on executing our business strategies.¹⁵⁴

Hyatt

Hyatt Hotels Corporation is listed on the New York Stock Exchange and in 2016 it was reportedly worth more than \$3.5 billion.¹⁵⁵

Slavery and Human Trafficking Statement

Available at <https://www.hyatt.com/content/dam/Minisites/hyattthrive/reports/Hyatt-Global-Human-Rights-Statement-Modern-Day-Slavery-020117.pdf>. Dated January 2017.

Hyatt's statement does not describe its business or supply chain beyond saying that it develops, owns, operates, manages, franchises, licenses or provides services to a portfolio of properties.

Hyatt states that it 'Respects the human rights of our colleagues including freedom from discrimination, forced or compulsory labour as well as freedom of association.' It says it complies with all applicable laws prohibiting the use of child labour.

The company says that it continuously assesses evolving human rights issues that have the potential to intersect with its business and that it is sensitive to the existence of human trafficking. There is no detail of the risk assessment process or of identified risks.

It lists its involvement in various multi-stakeholder and industry initiatives, and its provision of training on human trafficking.

Other relevant information available on the company's website

Hyatt's Supplier Code of Conduct states that suppliers must follow all relevant national and local laws and regulations, including those relating to labour and health and safety. There is a specific reference to compliance with minimum wage and working hours' requirements. Forced labour and child labour are not to be used. Suppliers must respect the human rights of workers, including the right to associate freely and to join a union or similar organization.¹⁵⁶ Hyatt's SEC 10-K filing for the year end December 2016 says: 'Negotiations of collective bargaining agreements, attempts by labor organizations to organize additional groups of our colleagues or changes in labor laws could disrupt our operations, increase our labor costs or interfere with the ability of our management to focus on executing our business strategies.'¹⁵⁷

InterContinental

InterContinental Hotels Group PLC (IHG) is a British multinational hotel company. Its brands include Crowne Plaza, Holiday Inn, Holiday Inn Express and Staybridge Suites. The company is listed on the London Stock Exchange and in 2016 was reportedly worth around \$3 billion.¹⁵⁸

Slavery and Human Trafficking Statement

Available at <https://www.ihgplc.com/en/responsible-business/our-people/modern-slavery>.
Dated 17 February 2017.

The company reports that it operates in almost 100 countries and franchises, leases, manages or owns more than 5,000 hotels. Its supply chain covers its corporate offices (mainly technology and professional services) and items including food, linens, cleaning supplies and furniture. Procurement happens both at the local hotel level and, for some locations, via centralised purchasing arrangements. Hotel owners will also have supply chains at different stages of their hotel's life-cycle, for instance at the construction stage for new build hotels.

An IHG external risk assessment commissioned in 2013 identified risks to the sector including human trafficking, forced labour, child labour and working conditions. In 2015 and 2016 four different areas of risk were examined further: (i) risks of modern slavery affecting colleagues in its own organisation including hotels, (ii) risks of modern slavery occurring in corporate or hotel supply chains, (iii) risks of modern slavery such as human trafficking occurring in or around IHG branded hotels, and (iv) risks of modern slavery occurring at different stages of the hotel lifecycle and within supply chains of its hotel owners. Following this risk assessment the company prioritised raising awareness of human trafficking and the potential risk of hotels being used for this purpose to transport or exploit victims, and creating a number of training and publicity materials.

It reports that in 2015 it asked existing suppliers to sign the Vendor Code and that approximately 1,600 suppliers have now signed.

Other relevant information available on the company's website

IHG's Vendor Code of Conduct ¹⁵⁹ includes requirements for vendors:

- to support the protection of human rights, particularly those of its employees, the parties with whom it conducts business and the communities where it operates
- to respect its employees' rights to voluntary freedom of association under the law
- to provide a safe and healthy working environment
- to not support forced and compulsory labour or the exploitation of children

Vendors are also required to use reasonable efforts to ensure that subcontractors and suppliers also operate in a manner consistent with the IHG Vendor Code of Conduct.

Marriott

Marriott International Inc. is an American multinational hotel company. Marriott was reportedly worth more than \$5.3 billion in 2016 and is listed on the NASDAQ-100 index.¹⁶⁰

Slavery and Human Trafficking Statement

Available at: <https://www.marriott.co.uk/Multimedia/PDF/Home%20page/2016%20UK%20Human%20Trafficking%20Statement.pdf>. Not dated.

The statement details steps taken by Marriott Hotels Ltd and its parent company, Marriott International, Inc. The statement applies to Marriott International's corporate offices, managed, leased and owned hotels. The company reports that the Marriott name is on nearly 6,000 managed and franchised properties in 120 countries and territories around the world. It says it encourages owners and franchise partners to adopt similar policies within their businesses.

The company says that it implements an ongoing risk management process to identify, prevent and mitigate relevant human rights risks; no additional substantive detail is provided, including of risks identified.

Global contracts executed by Marriott require contractors to comply with the company's Global Supplier Code of Conduct, which includes standards on forced labour. The company delivers a number of training programmes on human trafficking prevention.

Other relevant information available on the company's website

Marriott's Supplier Conduct Principles says it expects and encourages suppliers to adhere to all applicable laws and regulations. Suppliers are expected to provide a safe and secure work environment and support the elimination of all forms of forced, bonded or compulsory labour, and all forms of human trafficking including the exploitation of children. The document says that the company may take steps to assess a tier-one supplier's adherence to the principles.¹⁶¹

4. House-builders

A 2015 EU Fundamental Rights Agency report found that construction was the second largest economic sector prone to labour exploitation in the EU, after agriculture, forestry and fishing.¹⁶² The construction sector has been identified as at-risk to modern slavery due to complex subcontractor chains, temporary and informal contracts, the high number of workers from potentially vulnerable groups (particularly migrants), and the low-skilled nature of the work involved.

Factors compounding abusive practices include workers' lack of understanding of their legal rights and an opaque supply chain structure involving labour brokers and subcontractors. The prevalence of sourcing workers from third parties - whether subcontractors or labour agencies - drives a competitive market focused on cost reduction. Those involved in the supply of labour and responsible for building works seek contracts with large construction companies and may recruit flexible and cheap labour to win these contracts.

Unscrupulous employers often pursue a strategy of avoiding transparency and traceability. Information relating to employment expectations and standards may be concealed, making it extremely difficult for workers to challenge unfair practices and for law enforcement agencies to properly investigate instances of exploitation and labour abuse. These abuses include paying wages in cash and at varying intervals, arbitrary salary deductions, long working hours and poor communication about employment rights.¹⁶³

The sourcing and production of building materials is an additional concern. Countries of origin for bricks, timber, glass, granite and other materials are often unknown and many companies are reluctant to disclose source country data or have yet to trace their supply chains. Research indicates that the materials used are often produced in countries where forced and child labour is rife.¹⁶⁴

Summary analysis of company statements and other publications

All five companies have published Slavery & Human Trafficking Statements. Barratt lists direct, agency or temporary workers; subcontractor relationships; material suppliers; and IT services as key risks. It has carried out a risk assessment of all group agreement suppliers based on geography of manufacturing location and scale of spend, and has followed-up with those assessed at first stage as high risk. Bellway provides an overview of its supply chain but does not acknowledge the specific risks of modern slavery associated with the construction sector nor does it specify steps taken in addressing those risks. Berkeley reports that an informal risk assessment was carried out to identify the contractors that may pose a higher risk of modern slavery but detail of the risks and contractors is not provided. The company plans to roll out a formal risk assessment over the 2016/17 financial year. Bovis provides limited detail on its supply chain, but recognises that there is a high risk of slavery in the construction industry and reports on actions to address this including contacting suppliers, mapping the supply chain and reviewing its relationship with recruiters. Unite Students reports on action taken following a 2016 procurement/supply chain risk assessment, including centralising more contracts, delivering a more standardised approach to employment practices monitoring and compliance in the supply chain and building long-term relationships with UK-based suppliers.

Other relevant published materials include Barratt's General Terms to All Contractors which includes clauses on forced labour prevention, and information on Bellway's Supply Chain Assessment Process. Berkeley comments that it encourages contractors and their supply chains to pay the Living Wage. Unite Students has published its Sustainable Procurement policy which covers labour rights.

Barratt Developments plc

Barratt Developments plc is a residential property developer based in Coalville, UK. It has been listed on the London Stock Exchange since 1968 and is a constituent of the FTSE 100 Index. It reported a profit of £682.3 million in 2016.¹⁶⁵

Slavery and Human Trafficking Statement

Available at <http://www.barrattdevelopments.co.uk/sustainability/our-policies>. Dated October 2016.

The company reports that it has 200 group materials agreements, with 90 per cent of the group construction materials and components manufactured in the UK, 8 per cent in Europe and less than 2 per cent in the rest of the world.

It lists: direct, agency or temporary workers; subcontractor relationships; material suppliers; and IT services as key risks, and says that based on the risk assessment, it believes the business has a low overall risk of modern slavery in both its own operations and in its supply chain. Barratt states that it '...is committed to ensuring business policies, procedures, requests and contracts do not place unnecessary demands on a supplier which may lead them to violate their obligations. This could include late payment, low payment, and high pressure time demands.'

The company mentions that agency providers must 'satisfy us that staff all have written employment contracts, have not had to pay for the opportunity to work, and are legally able to work within the UK.' Subcontractors' and IT services' codes of conduct and terms and conditions include Barratt's modern slavery policies. Barratt has carried out a risk assessment of all group agreement suppliers based on geography of manufacturing location and scale of spend. For those materials suppliers assessed at the first stage as high risk, Barratt has requested further information on their ethical sourcing policy and will take appropriate steps based on this information.

The statement says that the company works with suppliers to support necessary improvements and takes action if suppliers and subcontractors are not prepared to make necessary improvements, and reviews compliance through periodic review meetings and auditing where there is higher risk, but does not provide detail or examples of assessment and actions taken.

Other relevant information available on the company's website

A page on Barratt's Commercial Support website provides basic information about the Modern Slavery Act.¹⁶⁶ The company's General Terms to All Contractors includes a section on the Modern Slavery Act requiring contractors '...to ensure and provide assurance to the Company, as part of the Pre-Order Meeting Minutes, that all persons working on site are doing so in full compliance with the Modern Slavery Act 2015.' The contractor is also obliged to ensure '...that no person is held in slavery, servitude and forced or compulsory labour that no person arranges or facilitates the travel of another person with a view to that person being exploited in relation to: slavery, servitude and forced or compulsory labour.'¹⁶⁷

The 'Supply Chain Responsibilities' section of the company's Sustainable Procurement Policy commits Barratt to selecting products and sources of supply that consider environmental and social criteria. Supply chain partners are expected to adopt Barratt's policy requirements unless there are compelling reasons not to do so (e.g. a disproportionate economic impact upon small sub-contractors or businesses).¹⁶⁸

Bellway plc

Bellway plc is a UK residential property developer based in Newcastle-upon-Tyne. It is listed on the London Stock Exchange and is a constituent of the FTSE 250 Index. It reported a revenue of £2.2 billion in 2016.¹⁶⁹

Slavery and Human Trafficking Statement

Available at: <http://www.bellwaycorporate.com/sites/default/files/pdfs/slavery-and-human-trafficking-statement-2015-2016.pdf>. Dated November 2016.

The company's statement does not acknowledge the specific risks of modern slavery associated with the construction sector nor does it specify steps taken in addressing those risks. The supply chain is described as including: purchasing materials, sub-contracting, design consultants, environmental and other associated trades and services connected with housebuilding. The link in the document to the Anti-Slavery policy leads to a 'page not found' on the company website.

The statement says the company has appointed a Group HR Director who will review the group's policies and processes, and that the company is reviewing its supply chain agreements. It reports that it communicates its zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of its business relationship with them.

Other relevant information available on the company's website

Slavery, trafficking and other labour rights abuses are not included on the list of 'Corporate Responsibility Risks' available on the company's website.¹⁷⁰ On a page covering Procurement and Supply Chain Management, the following information is provided under the heading 'Supply Chain Assessments':

We have recently launched the first stages of a comprehensive assessment process of our supplier base. An initial top-level review assessment to identify any key potential risks in our supply chain has been followed up by questionnaire-based assessment of all our Group suppliers. Where specific issues are discovered, Bellway will work with the relevant supplier to address any shortcoming prior to a reassessment. Future plans may include the extension of this assessment process to our local divisional suppliers and potentially our sub-contractors.¹⁷¹

Berkeley Group

Berkeley Group Holdings plc is a UK housebuilding company made up of five autonomous companies; St George, St James, Berkeley, St Edward and St William. It is publicly-owned and listed on the London Stock Exchange as a FTSE 250 company. It reported a profit of £479.9 million in 2016.¹⁷²

Slavery and Human Trafficking Statement

Available at <https://www.berkeleygroup.co.uk/modern-slavery-statement>. Dated August 2016.

A central 'Call-Off' team administers Berkeley's database of approved construction sub-contractors on behalf of the Group companies. It reports that a review of spending levels indicated that the majority of all operating companies' supply chains come through the Call-Off team.

An informal risk assessment was carried out in February 2016 to identify the contractors that may pose a higher risk of modern slavery and child labour. Detail of the risks and contractors is not provided. The company plans to survey contractors on the measures they are taking to address risks and will use the responses to roll out a formal risk assessment over the 2016/17 financial year.

Other relevant information available on the company's website

In the Sustainability section of its website, Berkeley states: 'We outsource much of the development and construction process and work with approximately 7,500 contractors and suppliers, with an estimated value in excess of £450 million (excluding land purchases).'¹⁷³ Berkeley is committed to paying at least the Living Wage Foundation's Living Wage to all direct employees¹⁷⁴ and the Company's Sustainable Specification and Procurement Policy commits the company to ensuring contract prices and terms are 'ethical, fair and respected' and to encouraging contractors and their supply chains to pay the LWF's Living Wage.¹⁷⁵

Bovis Homes

Bovis Homes Group plc is a house-building company based in New Ash Green, Kent. It is listed on the London Stock Exchange and is a constituent of the FTSE 250 Index and the FTSE4Good indices. It reported revenue of £1,054.8 million in 2016.¹⁷⁶

Slavery and Human Trafficking Statement

Available at <https://www.bovishomesgroup.co.uk/~ /media/Files/B/Bovis-Homes-Group/documents/csr/company-policy-statement-modern-slavery-act-2017.pdf>. Dated June 2017.

Bovis states that its supply chain involves local, national and international companies and that each region arranges its own supply of goods and services. It maintains group-wide deals with national suppliers whose products or services are required to be used on all developments including those of brick, block and insulation materials. No further detail is provided.

The company has an anti-slavery policy that is, or is due to be incorporated into agreements with supplies and sub-contractors. The policy could not be found on the company's website.

The statement recognises that there is a high risk of slavery in the construction industry due to the demand for low skilled workers, raw materials sourcing from countries where slavery is prominent and collaboration with smaller businesses who do not understand the risks. To address these risks, Bovis has: contacted suppliers; started mapping the supply chain and areas of risk; rolled out technology to monitor subcontractors on site; reviewed its relationship with recruiters for high-risk practices and trained staff to spot risks. On the company's human rights due diligence process, Bovis states that its due diligence process involves assessing contractors through an adjudication process, but provides no further detail.

Other relevant information available on the company's website

None found.

Unite Students

Unite Students is a manager and developer of student accommodation in the UK. 'Unite Students' is the trade name for The Unite Group Plc, a London Stock Exchange listed business and a constituent of the FTSE 250 Index. It reported a profit of £201 million in 2016.¹⁷⁷ Unite Students is an accredited Living Wage employer, meaning it pays the Living Wage to both permanent employees and third-party contractors.

Slavery and Human Trafficking Statement

Available at <http://www.unite-group.co.uk/responsibility/modern-slavery-statement>. Not dated.

The statement acknowledges that suppliers' sourcing of construction material and the provision of manual labour in property development and management services are areas of significant risk. The statement says that some suppliers 'source some materials from around the world', but no further detail is provided.

The statement mentions that following a 2016 procurement/supply chain risk assessment, the company: centralised more contracts, focusing on supply chains identified as having a higher risk of slavery and trafficking; strengthened procurement practices to deliver a more standardised approach to employment practices' monitoring and compliance in the supply chain; built long term relationships with UK-based suppliers and framework contractors; maintained systems to encourage the reporting of concerns and the protection of whistle-blowers in the supply chain.

The statement also says that the company's Sustainable Procurement Policy requires suppliers to have policies in place regarding the minimum legal age of employment and compliance with local laws regarding working hours and overtime, requires suppliers to provide employees with at least the minimum wage and encourages suppliers to adopt and adhere to the Living Wage principles. To help ensure compliance with this policy, Unite Students works with suppliers using the Chartered Institute of Procurement and Supply's (CIPS) Sustainability Index, which focuses on social issues as well as broader sustainability risks, with Modern Slavery captured within the Social pillar. The statement says 'Prospective suppliers' compliance with social issues plays a key part of our competitive tender stage and our approved suppliers go through due diligence to ensure compliance.' Details of this due diligence are not provided.

Other relevant information available on the company's website

Unite Student's Sustainable Procurement Policy covers child labour, working hours, a section on terms of employment stating that suppliers must not use forced or compulsory labour or require monetary deposits from employees in order to start or continue their employment and that terms of employment should be communicated to employees in a contract. The Policy also states that 'Our supply base must allow employees freedom of association. If the law restricts freedom of association and collective bargaining, then employers should facilitate alternative means of representation for staff.'¹⁷⁸

5. Outsourcing Companies

Outsourcing companies operate globally and provide services to the public and private sectors across a wide range of functions, including but not limited to: cleaning; security; catering; construction; social care; waste management; transport; and prisons management. For reasons outlined in the sections above, the nature of work in some of these sectors (low-paid and low-skilled, often carried out by vulnerable workers) can create a heightened risk of modern slavery. Outsourcing firms also source from sectors with a heightened risk, notably food and garment production (for uniforms), and have operations in countries ranked as high risk for modern slavery.

Summary analysis of company statements and other publications

All five companies have published Slavery & Human Trafficking statements, mostly (but not exclusively) identifying their supply chains as the main area of risk, rather than their own operations. G4S provides an overview of its supply chain and says it plans to undertake risk assessments in 2017. It notes its reliance on migrant labour and the heightened vulnerability of migrant workers. Interserve describes its operations and identifies the main modern slavery risk as bringing workers employed by other companies onto its own customers' sites and acknowledges potential risk in its supply chain, particularly in relation to its Middle East associate companies' operations. Mitie identifies potential areas of risk in its supply chain and reports plans to discuss tier one and tier two audits. Serco assesses human rights impacts for existing and new business operations and markets. It describes its tier one supply chain and its human rights assessment process. Its current assessment is of a low risk of slavery and human trafficking taking place in its direct business operations. It reports that it undertakes due diligence of tier one suppliers and says it will seek to strengthen its due diligence process in 2017. Sodexo Holdings provides an overview of its suppliers by spend type, vendor count and percentage volume of spend. Information is provided on supplier risk assessment.

Other company publications include G4S Business Ethics Policy which states its support for the four fundamental principles in the ILO Declaration and the company's human rights policy which describes labour rights including freedom of association and the right to engage in collective bargaining as central to the business. The Integrated Report and Accounts 2016 reference processes in place to assess the Group's human rights risks. The company's 2016 CSR report describes a geographic review which identified 47 regions with heightened human rights risks, including the local attitude to labour rights and standards. One of the company's 2017 priorities is to commence a review of its supply chain. Its Supplier Code of Conduct requires suppliers to act in line with the ILO Declaration on Fundamental Principles and Rights at Work.

Interserve publishes its human rights policy.

Mitie's formal materiality process has identified labour conditions as the most material issue for stakeholders and for the business. Before subcontractors are appointed, a risk assessment must be carried out and mitigation measures put in place. The company has published Supplier Guidance on the Modern Slavery Act.

In its Code of Conduct, Serco reiterates that it will never use forced, compulsory, illegal or child labour, or knowingly work with anyone who does. Serco's Group Standard: Business Conduct & Ethics says that the company will 'respect labour and union rights and obligations applicable to Serco's business' (S30 d.).¹⁷⁹ Its Group Standard Operating Procedure Human Rights Decision Tree defines the process which must be followed so that the company can rule out opportunities where it would potentially harm human rights. The document includes

examples of potential indirect impacts including when major suppliers are involved in abuses such as using child labour. In a section on mitigating impacts on human rights, the document notes that the laws of a country may prevent Serco from allowing its employees to unionise, potentially violating the right to organize and participate in collective bargaining. It continues that the company may still be able to protect its employees' right to representation, while complying with the law.¹⁸⁰

Serco's Group Standard: Employee Lifecycle document sets out that the company will adhere to local legislation with respect to working with employee representative bodies and unions, and states that where appropriate, unions and employee representative bodies will be recognised through local agreements. The company says that it will work with recognised unions where collective bargaining is in place.¹⁸¹

The company's Group Standard: Procurement and Supply Chain document specifies that Serco will manage its procurement services with the aim of expecting fair pay and working conditions. The company sets out its expectation that suppliers do not use child labour or forced labour, and that suppliers should not expect employees to hand over ID documents as a condition of employment. Suppliers must recognise and respect rights of free association and collective bargaining, pay the minimum wage and legally mandated benefits, and working hours must not exceed 60 hours per week including overtime.

G4S

G4S Plc is a British-Danish dually-traded company with worldwide security service operations. It is listed on the London Stock Exchange and the Copenhagen Stock Exchange, and recorded revenue of £6.8 billion in 2016.¹⁸²

Slavery and Human Trafficking Statement

Available at <http://www.g4s.com/en/Social-Responsibility/Safeguarding-our-integrity/Slavery-and-Human-Trafficking-Statement-2016>. Dated 24 May 2017.

G4S reports that it has more than 55,000 suppliers supporting its operations, providing a range of goods and services such as professional services, uniforms, IT, vehicles, catering and security equipment. The company states that it reserves the right to audit suppliers, but no further detail is provided. G4S says that during 2017, it will undertake assessments of UK and Ireland regional supply chains and relevant suppliers in other (unnamed) regions to assess and help ensure that those suppliers meet the standards of its Supplier Code of Conduct and to develop action plans to address any that do not.

The company notes its reliance on migrant labour '...in a number of G4S businesses where the availability of local labour is scarce.' It recognises that migrant workers are often outside the legal protection of their countries of national origin and that this makes them vulnerable to abuse and exploitation. G4S says it has produced a Migrant Workers Policy which covers the use of recruitment agencies, the standards of accommodation workers should expect to receive, and their employment terms and conditions. We could not find this policy on the company's website.

Other relevant information available on the company's website

In its Business Ethics Policy G4S states its support for the four fundamental principles in the ILO Declaration.¹⁸³ The company's Human Rights Policy describes labour rights (including

freedom of association and the right to engage in collective bargaining) and the right to an adequate standard of living as central to the business. It commits to making human rights due diligence an “essential and integrated” part of its business processes and to act upon the findings of this due diligence to ensure that it prevents human rights violations wherever possible, and delivers appropriate and effective remedy if it fails to prevent abuses. G4S says it will develop a distinct understanding of particular human rights risks in each context where it operates.¹⁸⁴

The company’s Integrated Report and Accounts 2016 says that there are processes in place to assess the Group’s human rights risks in many areas such as bidding for major contracts, entering new markets and analysing the environments in which it operates. These practices are driven by an annual assessment of human rights risks and a series of assessments and reviews in markets where risks exist. The report continues that action is taken when a risk is identified: ‘In some cases, this means that a business or operation can be scrutinised intensely by either G4S or independent experts.’¹⁸⁵

It reports that in 2016 it carried out a global human rights impact assessment. No information is given on identified risks, however in its 2016 CSR report, G4S states that a review of 107 geographic regions for its human rights heatmap identified 47 regions in which human rights may be at high or very high-risk and that risks included the local attitude to labour rights and standards. It reports that the findings of this review are integrated into its risk and compliance processes and may trigger additional levels of assessment and internal audit where necessary. It has also undertaken an ongoing review of policies, standards and business processes to help ensure that it does not allow modern slavery to occur within its business or supply chain. One of the company’s 2017 priorities is to commence a review of its supply chain to assess and help ensure that all suppliers meet the standards of its supplier code of conduct and develop action plans to address any that do not.¹⁸⁶

The Supplier Code of Conduct applies to all G4S Suppliers and their sub-contractors. The Code specifies that should any audit identify any levels of non-compliance, the Supplier will be required to provide a detailed remedial action plan within twenty eight days. Suppliers are required to act in line with the ILO Declaration on Fundamental Principles and Rights at Work. Suppliers must agree: not to employ or make anyone work against their will; not to employ workers under the age of 15; and to recognise, as far as legally possible, the right of free association of employees.¹⁸⁷

Interserve

Interserve plc is a multinational support services and construction company based in the UK and listed on the London Stock Exchange. In 2016 it reported gross revenue of £3.2 billion.¹⁸⁸

Slavery and Human Trafficking Statement

Available at: <http://www.interserve.com/about-us/policies>. Dated 24 January 2017.

The company reports that it has a workforce of c.51,000 in the UK, c.9,000 in its overseas subsidiaries and c.20,000 in its Middle East associate companies, delivering construction, support services, and frontline services covering a range of sectors worldwide. It identifies the main modern slavery risk within its subsidiaries’ operations as bringing workers employed by other companies, particularly agency workers onto its own customers’ sites. It also acknowledges potential risk in its supply chain in relation to goods and services at tiers one and below. It says that in relation to the operations of its Middle East associate companies, the main area of risk is in the supply chain. The statement says: ‘We are conducting ongoing

audits on the work camps and worker welfare standards of all labour suppliers and of the key sub-contractors. Our sub-contracts and labour agreements are being amended to include reference to ILO standards. Compliance will be reinforced through random audits undertaken on a risk-based basis.'

In relation to the recruitment of the directly employed workforce of Middle East associate companies, Interserve states that candidates are sourced through approved recruitment agencies only, that terms and conditions are explained, with follow-up face-to-face interviews with employees and ensuring they receive timely payment. Additional detail on identified risks and responses are not discussed.

Other relevant information available on the company's website

Interserve's Human Rights policy states that it respects the ILO Declaration on Fundamental Principles and Rights at Work. It says that in support of the policy it will embed human rights issues in internal risk assessment processes and guidelines, and continue to develop operating procedures to create an environment where human rights are respected.¹⁸⁹

Mitie

Mitie Group PLC is a British outsourcing and energy services company. It provides services in infrastructure consultancy, facilities and property management, energy and healthcare services. The company is listed on the London Stock Exchange and recorded revenue of £2.2 billion in 2016.¹⁹⁰

Slavery and Human Trafficking Statement

Available at: <https://www.mitie.com/sustainability/modern-slavery-act/>. Dated 28 September 2016.

The company's business includes facilities' consultancy, management and service delivery; social housing repairs, maintenance and painting; a range of support services to ill, disabled and infirm people. It says that its supply chain is characterised by skilled technical contractors and trades and that occasionally it uses temporary labour to support certain areas (e.g. cleaners, carers and site employees).

Mitie states that it endorses the tenets of the ILO Declaration on Fundamental Principles and Rights at Work and that it ensures that employment is chosen freely; freedom of association is respected; and child labour is not used. It says 'We employ most of our people directly or on a fixed term basis with checks in place to ensure that payment of salary is direct to that person.' Its recruitment procedure includes a requirement to use approved agencies and its on-boarding procedure ensures that agencies can demonstrate that they comply with all legal requirements, including the Modern Slavery Act 2015. It reports that it ensures all suppliers comply with its Supplier Code of Conduct and that its terms and conditions require that suppliers comply with all legal requirements.

Potential areas of identified risk in the supply chain include: companies that operate using temporary low skilled labour; operating outside of UK / EU regulatory frameworks; manufacturing or trading in raw materials produced in non UK / EU areas; companies that have a strategic partnership with Mitie. Specific details are not provided. The company reports that its procurement teams carry out audits as part of its supply chain management; 60 tier one suppliers will be assessed this year and Mitie reports that it will be looking at tier two suppliers next year.

Other relevant information available on the company's website

Mitie's formal materiality process has identified labour conditions as the most material issue for stakeholders and for the business. The company states that it is committed to protecting the human rights of all employees and that it strives to provide a workplace free of harm, and expects suppliers to do the same.¹⁹¹

Mitie's Procurement Policy states that any right to subcontract included in a contract is bound by the same terms and conditions, and is expressly agreed and approved by the contract manager prior to commencement. Before subcontractors are appointed, a risk assessment must be carried out and mitigation measures put in place. The policy says that suppliers must be monitored to ensure that the supply chain risk is managed, and that this is a responsibility of the procurement team.¹⁹²

The company's UK Standard Purchasing Terms and Conditions state that: 'In providing the Works, the Contractor shall...obtain and at all times maintain all necessary licenses and consents, and comply with all applicable laws and regulations (including anti-bribery and anti-slavery laws and regulations).'¹⁹³

The company has also published Supplier Guidance on the Modern Slavery Act.¹⁹⁴

Serco

Serco Group plc is a British outsourcing company based in Hook, Hampshire. The company is responsible for running public services in defence, transport, justice, immigration, healthcare, and has more than 50,000 staff globally. The company is listed on the London Stock Exchange and reported revenues of more than £3 billion in 2016.¹⁹⁵

Slavery and Human Trafficking Statement

Available at: <https://www.serco.com/media/1553/1553.original.pdf>. Dated January 2017.

The statement relates to Serco Group plc and covers all business regions, operating companies and business units throughout the world, including wholly owned subsidiaries and majority-owned operations. Serco states that it does not engage in any form of human trafficking or use forced, compulsory, illegal or child labour, or knowingly work with anyone who does.

The statement describes Serco's tier one supply chain which includes 15,600 suppliers, with 97 per cent of spend going to ten countries. The company discloses that it has suppliers in four countries "...highlighted as being in the Top 10 Global Slavery Index." The company provides a breakdown of spend by category, with 57 per cent going to facilities management, corporate services and ICT.

The company reports that it uses a human rights assessment and decision tree process to evaluate any adverse human rights impacts caused or contributed to by its operations, and impacts directly linked to its operations through business partners and related third parties. Human rights impacts are assessed for existing business operations and markets; along with appropriate due diligence, for new markets, geographies, acquisitions, bids and rebid opportunities; and for business partners and related third parties when acting in connection with Serco's own operations. It states that its current assessment is of a low risk of slavery and human trafficking taking place in its direct business operations and gives examples of initiatives to address potential problems in out-of-country employment agencies, particularly those based in high risk countries, and UK immigration operations.

Sercos reports that it undertakes due diligence of its tier one suppliers and enhanced due diligence for suppliers in high risk areas or where a potential issue has been raised. The company says it will seek to strengthen its due diligence process in specific risk areas in 2017. Sercos reports that during 2016 no issues relating to slavery and human trafficking were raised via its internal 'Speak Up' process.

Other relevant information available on the company's website

In its Code of Conduct, the company reiterates that it will never use forced, compulsory, illegal or child labour, or knowingly work with anyone who does, and that it has a zero tolerance policy towards any form of human trafficking. The Code notes that a company can indirectly violate human rights, as the result of someone in a company's network of business relationships committing an abuse, like a supplier or third party.¹⁹⁶

Sercos's Group Standard: Business Conduct & Ethics says that the company will 'respect labour and union rights and obligations applicable to Sercos's business' (S30 d.)¹⁹⁷

Sercos has created a Group Standard Operating Procedure Human Rights Decision Tree defining the process which must be followed so that the company can rule out opportunities where it would potentially harm human rights. The document includes examples of potential indirect impacts on human rights, and states that 'There are instances when an indirect impact is so significant that it should effectively be treated as a direct impact. An obvious example is when major suppliers are involved in abuses such as using child labour.' The document outlines that the concept of 'reasonableness' is useful when assessing the significance of direct impacts and gives the following example:

'...the ability to fully assure the entire supply chain will vary from opportunity to opportunity and from supplier to supplier:

- it would be reasonable to expect us to identify abuses by important suppliers and we should do sufficient work to reassure ourselves about their human rights records
- it would not be reasonable to expect us to identify abuses by a small supplier several tiers down the supply chain. Our connection to the abuses may be too remote and our complicity would therefore be negligible.'

In a section on mitigating impacts on human rights, the document notes that the laws of a country may prevent Sercos from allowing its employees to unionise, potentially violating the right to organise and participate in collective bargaining. It continues that the company may still be able to protect its employees' right to representation, while complying with the law, and gives several options for this including a consultative management style and an anonymous complaints procedure.¹⁹⁸

Section 2.4 of Sercos's Group Standard: Employee Lifecycle document sets out that the company will adhere to local legislation with respect to working with employee representative bodies and unions, and states that where appropriate, unions and employee representative bodies will be recognised through local agreements. The company says that it will work with recognised unions where collective bargaining is in place and will consult with them in a timely manner and in line with recognised agreements. Procedures for resolving conflicts between the company and its employees, including local collective dispute resolution procedures are described.¹⁹⁹

The company's Group Standard: Procurement and Supply Chain document includes a section on responsible procurement. This specifies that responsible procurement will be considered

during the procurement process and that Serco will do all it can to avoid adverse impacts on human rights. It further states that Serco will manage its procurement services with the aim of (among other things) expecting fair pay and working conditions consistent with the goals of Serco and its clients, and preventing and mitigating potential and actual impacts on human rights. The document also says that suppliers will be required to establish and maintain ethical standards that are consistent with Serco's Business Conduct and Ethics Group Standard, and to respect labour and union rights and obligations applicable to the supplier and its business, and its business dealings with Serco.²⁰⁰

In Serco's Supplier Code of Conduct, the company says that it works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of Serco. The company sets out its expectation that suppliers do not use child labour or forced labour, and that suppliers should not expect employees to hand over ID documents as a condition of employment. Suppliers must pay the minimum wage and legally mandated benefits, and working hours must not exceed 60 hours per week including overtime. Suppliers must recognise and respect rights of free association and collective bargaining.²⁰¹

Sodexo Holdings Ltd.

Sodexo Holdings Ltd is part of the Sodexo Group, a French food services and facilities management company which provides services in construction management, reception and catering and security maintenance for schools, prisons, hospitals, military bases, remote sites and hospitality events. Its annual UK & Ireland turnover is approximately £1.4 billion.²⁰²

Slavery and Human Trafficking Statement

Available at: <http://uk.sodexo.com/home/corporate-responsibility/modern-slavery-act.html>.
Dated 6 December 2016.

Sodexo reports that it has 34,000 employees and is connected to 6000 businesses through its supply chain. It provides a map of the supply chain, categorising suppliers into three tiers. The company appears to use the word 'tier' to denote spend type, rather than the more common usage describing a supplier's position in the supply chain. Vendor count and percentage volume of spend are also provided. It says that a number of source products are from outside the UK and Ireland, and this is monitored and controlled on a risk basis looking at the nature of the product and the level of issues relating to corruption and human rights in the country of provenance. Additional detail is not provided.

Suppliers are required to sign a Code of Conduct that sets out specific expectations that suppliers avoid and address slavery and human trafficking in their operations and in their own supply chains. The link from the statement to the Code was not functioning at time of writing.

The company describes drawing on external expertise to identify and address supply chain risk, with seafood from Thailand given as an example. Sodexo has commenced a risk rating of categories of supplier spend encompassing: risk of fraud; social risk; environmental risk; and geographical stability, and has implemented a supplier governance team to monitor and govern its contractual relationships. Certain categories of suppliers must provide Sodexo with a slavery and human trafficking statement and maintain due diligence processes for their own staff and suppliers. The company reports that it stipulates warranties, indemnities and termination rights in its supplier contracts.

Other relevant information available on the company's website

Sodexo's Supplier Code of Conduct prohibits suppliers from using indentured, slave, bonded or other forced involuntary labour, and requires them to comply with laws regarding minimum employment age. Where no minimum age is mandated, the company requires a minimum employment age of 15. Further provisions cover freedom of association, collective bargaining and wages. It is Sodexo's policy to incorporate the principles of the code into its supplier agreements.²⁰³

The 'Risk Factors' chapter of the parent company's FY2016 registration document states that 'As far as it is aware Sodexo is not exposed to any specific labor-related risk other than those arising in the ordinary course of business for an international group of its size.'²⁰⁴

Endnotes

- 1 <http://www.legislation.gov.uk/ukpga/2015/30/section/54>
- 2 There may be statements that we did not locate and statements may have been published in between the report being finalized and its publication.
- 3 <https://www.antislavery.org/slavery-today/modern-slavery/>
- 4 <https://www.antislavery.org/slavery-today/forced-labour/>
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