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Addressing Forced Labor and other Modern Slavery Risks

A Toolkit for Corporate Suppliers



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Global Business Coalition
Against Human Trafficking

Introduction

This toolkit aims to help businesses in corporate supply chains quickly identify areas of their business which carry the highest risk of modern slavery and develop a simple plan to prevent and address any identified risks.

Businesses operating in global supply chains are more likely to encounter situations of modern slavery—the exploitation of people for personal or commercial gain—than their multinational counterparts, yet many lack simple guidance on how to identify, prevent and manage these risks effectively. This toolkit is specifically designed for human resources, procurement, and management teams within businesses in corporate supply chains (“corporate suppliers”) who are tasked with ensuring their organizations operate responsibly, including with respect for human rights.

Businesses will benefit from this guidance particularly if they:

- Employ migrant or temporary labor, or work with business partners that do.
- Seek to attract or retain global client companies.
- Aim to reduce of fines and business interruptions associated with modern slavery.

This toolkit uses the term “modern slavery” to describe a range practices that may be encountered by a supplier, including forced labor, labor trafficking, sex trafficking, and child labor. While child labor is discussed, more emphasis has been placed on the risks associated with forced labor, labor trafficking, and sex trafficking. This toolkit does not intend to be a comprehensive resource for suppliers on modern slavery. Rather, it is designed to point suppliers to high-risk areas where modern slavery may take place for a quick assessment and suggest additional comprehensive resources that will enable suppliers to better understand and address any identified impacts. The risks flagged and remediation actions offered are focused specifically on the impacts of modern slavery, and do not replace a human rights due diligence process, which is called for under the UN Guiding Principles on Business and Human Rights.

This resource was written by Shubha Chandra, Sara Enright, and Alice Pease of the [Global Business Coalition Against Human Trafficking](#) (GBCAT), a BSR Collaborative Initiative. It was developed with support from the ILO Global Business Network on Forced Labour, and input from a range of stakeholders. Its recommendations are based on desktop research as well as consultations with advisors and corporate members of GBCAT and their key suppliers.

The toolkit is organized around four sections, and covers common questions from suppliers on modern slavery, such as:

- I. What is modern slavery?
- II. Why does preventing modern slavery matter to corporate suppliers?
- III. What forms of modern slavery are corporate suppliers and their workers most likely to encounter?
- IV. Where do the greatest risks of modern slavery exist for corporate suppliers, and what should suppliers do to identify, prevent, and address these risks?

Further information and in-depth resources on the topics covered in the toolkit can be found on GBCAT’s website at www.gbcat.org/resourcesforsuppliers.

I. What is modern slavery?

Modern slavery is an umbrella term that although not universally defined, is used to describe practices that deprive an individual of their liberty and exploit them for personal or commercial gain using threat, violence, coercion, deception, or a combination of these tactics.

Freedom from slavery and other forms of servitude is a basic human right outlined in the Universal Declaration of Human Rights, the foundational document adopted by the United Nations that establishes the rights and freedoms everyone is entitled to by simply being human. It is also recognized in the International Bill of Human Rights,ⁱ and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work (“ILO Declaration”), which calls for the elimination of all forms of forced or compulsory labor and the effective abolition of child labor.ⁱⁱ While there is no universal definition of modern slavery, it is used to describe practices that deprive an individual of their liberty and exploit them for personal or commercial gain using threat, violence, coercion, deception, or a combination of these tactics. A growing number of countries around the world have introduced legislation which makes businesses legally accountable for crimes related to modern slavery and require businesses to be transparent about the steps they are taking to identify, prevent, and address modern slavery in their supply chains.ⁱⁱⁱ

The forms of modern slavery addressed in this toolkit are those imposed by private individuals or enterprises (as opposed to state-imposed forced labor). These are forced labor, labor trafficking, sex trafficking, and child labor. It is estimated that as many as 40 million people are victims of modern slavery around the world. This includes 25 million people in conditions of forced labor, with 16 million of these individuals working in the private sector.^{iv}

As the toolkit discusses in greater detail, workers of corporate suppliers may be subjected to conditions amounting to modern slavery during recruitment for a job, in a supplier’s own operations, as well as in the operations of a supplier’s business partner. Below are common indicators of modern slavery.

Common Indicators of Modern Slavery *

- » **Withholding of wages** that prevent a worker from terminating employment or finding a new job (e.g., worker is not paid appropriate wages or wages are less than agreed to, wages are paid with coupons or cash alternatives, wages are paid irregularly or with delays, wages are subjected to illegal/excessive deductions, payment is not made to worker’s own bank account)
- » **Intimidation and threats** against a worker and/or their family from the perspective of the worker (e.g., threatening to deport worker or report him/her to law enforcement if he/she does not continue to work)
- » **Physical and sexual violence** imposed by employer or employer’s agent on worker (e.g., visible injuries, aggressive behavior toward worker, anxiety, and fear among workers)
- » **Abuse of a worker’s vulnerability** (due to e.g., physical, or mental disability, young age, work permit tied to employer, irregular work status, poverty/lack of education, migrant worker/national status)
- » **Debt bondage or requirements to pay off debt** accrued by performing work which is vague in nature and duration (e.g., terms of repayment of loan are unclear, costs for recruitment and transportation are excessive, food and accommodation are charged at inflated prices, high interest rates are placed on loan, debt amounts are altered)
- » **Use of deception**, usually during recruitment (e.g., new terms and conditions are introduced in contract than previously agreed upon, contract is written in a language not understood by worker, vague terms and conditions are offered or no written contract is provided, lower

wages, a different job or housing arrangements are offered than previously agreed)

- » **Restriction of movement** during recruitment process, at work or within employer-controlled accommodations (e.g., locked doors, surveillance cameras or guards monitoring worker movement, permission required to leave employer-controlled premises or worker required to be accompanied by an agent of employer to leave)
- » **Isolation** (e.g., migrant worker does not speak local language and is not permitted to communicate with anyone, a worker whose phone is confiscated by the employer, a worker based in a remote or unknown location, making it difficult to return home)
- » **Retention of identity or working documents** during recruitment or employment that make a worker feel unable to leave the employer without losing his/her documents (e.g., seizing of passport, travel documents, work authorization forms)
- » **Abusive working and living conditions** which workers would voluntarily not otherwise endure (e.g., conducting hazardous or unsafe work, little or no protective gear or training offered, unsanitary or dirty living conditions, poor lighting and ventilation, lack of safe water and adequate food, crowded living quarters)
- » **Excessive working hours** (e.g., overtime is required to earn a minimum wage, workers are penalized for refusing overtime, workers are denied breaks, are not given days off or free time, work is tied to unrealistic production targets, working hours are beyond those set by national law)

*Adapted from the ILO Indicators of Forced Labour, and the Fair Labor Association's Indicators of Modern Slavery^{v,vi}

II. Why does preventing modern slavery matter to corporate suppliers?

Corporate suppliers that prevent modern slavery risks can take pride in knowing that they are respecting the rights of their workers. They are also investing in themselves by demonstrating to their clients that they are responsible supply chain partners.

Suppliers benefit from proactively managing modern slavery risks in several ways:

1. **Following the rule of law and adhering to international standards:** Suppliers that engage in modern slavery practices are breaking international and national laws, and may face legal, financial, or reputational consequences. While legislation and penalties may vary by country, global business standards such as the UN Guiding Principles on Business and Human Rights (UNGPs), place a responsibility on business regardless of size, geography, and sector to respect human rights covered in the International Bill of Human Rights and ILO Declaration, and to not create harm through their own activities or the activities of their business partners.
2. **Attracting and retaining global clients:** Global companies increasingly prioritize suppliers that operate ethically and responsibly. As companies around the world face mounting pressure from investors, consumers, and governments to maintain responsible and transparent supply chains, corporate suppliers will also feel increased expectations from their global clients to operate responsibly, which includes addressing modern slavery risks.^{vii} Suppliers that understand, effectively manage, and report on their actions to address modern slavery within their operations and those of their business partners are positioning themselves as reliable current and future suppliers.

3. **Reducing the risk of fines and business interruptions:** By taking a proactive approach, suppliers can prevent operational interruptions (e.g., delayed shipments, confiscation of goods) and reduce financial costs and fines associated with modern slavery. This is particularly relevant today as suppliers that are suspected of using forced or child labor in the production of their goods may have their goods barred from entry in certain geographies. Suppliers may also be subjected to sanctions if their products are manufactured by individuals in state-imposed forced labor programs. ^{viii}

III. What forms of modern slavery are corporate suppliers and their workers most likely to encounter?

Corporate suppliers are most likely to be confronted with situations of forced labor, labor trafficking, sex trafficking, and child labor.

Suppliers are likely be confronted with situations of forced labor, labor trafficking and sex trafficking, and child labor. The table below summarizes each of these forms of modern slavery, identifies key indicators, and includes sample high-risk industries where this form of modern slavery is a documented risk. There are several key indicators which are common across different forms of modern slavery, demonstrating that a victim of forced labor, for example, can also be a victim of labor trafficking.

It is important to note that the presence of a single indicator does not necessarily imply a type of modern slavery is taking place. However, it does indicate that there may be some level of worker exploitation. Suppliers should seek to understand how each of these indicators may play out in their own business context. Suppliers should also engage in ongoing communication with their workers to ensure they do not engage in practices that may inadvertently place workers in situations which could amount to a form of modern slavery.

Forms of modern slavery that corporate suppliers may encounter

Type	Description	High-Risk Industries (example commodities) ^x	Key Indicators
Forced Labor	Any work or service performed by a person involuntarily and under the threat of penalty. ^x	<ul style="list-style-type: none"> • Agriculture or Farming (fish, shrimp, meatpacking, fruits, vegetables, tea, tobacco, cotton, and palm oil) • Apparel/Garment (thread, fasteners) • Business Process Outsourcing • Construction and Mining (bricks, stones, steel, minerals, and metals) • Electronics Manufacturing (computers, tablets) 	<ul style="list-style-type: none"> • Abuse of vulnerability • Deception • Restriction of movement • Isolation • Physical and sexual violence • Intimidation and threats • Retention of identity documents • Withholding of wages • Debt bondage • Abusive working and living conditions • Excessive overtime • Financial penalties for voluntary termination
Labor Trafficking	Situation in which a person is involuntarily transferred or transported using threat, force, coercion, fraud, deception, or abuse of power	<ul style="list-style-type: none"> • Agriculture or Farming (fish, shrimp) • Construction (residence or commercial buildings) • Electronics Manufacturing (computer, tablets) ^{xii} 	<ul style="list-style-type: none"> • Reliance on temporary or migrant labor • Restriction of movement • Isolation (isolated workplaces and working conditions) • Retention of identity documents

	for the purpose of conducting work (often manual work). ^{xi}	<ul style="list-style-type: none"> • Food production (production facilities) • Forestry (timber, bamboo) • Garment/Apparel (clothing) 	<ul style="list-style-type: none"> • Withholding of wages • Deception • Abuse of vulnerability
Sex Trafficking	Situation in which a person is involuntarily transferred or transported using threat, force, coercion, fraud, deception, or abuse of power for the purpose of prostitution and commercial sexual acts. ^{xiii}	<ul style="list-style-type: none"> • Extractives/Mining (mining camps) • Hospitality (motels, hotels) • Transportation and Freight (airplanes, buses, trains, trucking) 	<ul style="list-style-type: none"> • Deception (recruitment under false pretenses of work or romantic involvement with the employer) • Restriction of movement • Isolation (isolated workplaces and working conditions) • Physical, sexual, or emotional abuse • Retention of identity documents • Withholding of wages • Same residence as the employer
Child Labor	Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. ^{xiv,xv}	<ul style="list-style-type: none"> • Agriculture or Farming (fruits, vegetables, tea, tobacco, cotton, and palm oil) • Construction (bricks) • Electronics Manufacturing (computers, tablets) • Extractives and mining (metals, minerals) • Manufacturing (healthcare equipment) • Textile Manufacturing (cotton, leather, silk, wool)^{xvi} 	<ul style="list-style-type: none"> • Unverified age of workers • Abusive working and living conditions • Excessive hours and overtime • Separation from families • Reduced or lack of school attendance

WHICH INDIVIDUALS ARE MOST VULNERABLE TO MODERN SLAVERY?

While anyone can be a victim of modern slavery, individuals who are already socially or economically marginalized are most vulnerable. These include individuals with limited skills, women, children, ethnic and religious minorities, persons with disabilities, refugees, and migrant workers.

Individuals who have limited opportunities to secure a decent wage and good work and are more likely to fall prey to deceptive job offers which could lead to a situation of modern slavery. Women and children are disproportionately affected by certain forms of modern slavery (e.g., sex trafficking, child labor) which can be attributed to, among other factors, their limited ability to advocate for their rights, particularly in societies where women’s rights and children’s rights are not respected.

Migrant workers are individuals who leave their place of residence, either in country or across an international border for work, but do not intend to permanently live in the region where they work.^{xvii} Many migrant workers come from low socioeconomic backgrounds with limited education. They are prompted to seek employment outside of home as there are limited opportunities to earn a decent wage where they reside. During recruitment, migrant workers may be particularly susceptible to illegal recruitment fees, as many are desperate to find work. Once outside their home, migrant workers may face a range of additional challenges which make them feel isolated and vulnerable, such as unfamiliarity with the local language, a lack of social support, and a heavy reliance on their employer for basic services such as housing and food. Migrant workers who cross international borders often lack access to labor protections and benefits afforded to native workers under national law. This places such migrant workers at a greater risk of being entrapped in situations of modern slavery.



WHICH GEOGRAPHIES ARE MOST AFFECTED BY MODERN SLAVERY?

While modern slavery can take place anywhere in the world, it is more prevalent in geographies which are conflict-affected, have a weak rule of law (e.g., because laws are not enforced), experience widespread bribery and corruption, and/or provide weak human rights protections to their citizens (e.g., limits on freedom of expression, weak labor unions, limited protection of women’s rights). Geographies which welcome large populations of low-skilled workers and migrant workers also tend to be hot spots for modern slavery.

EXAMPLES OF MODERN SLAVERY IN CORPORATE SUPPLY CHAINS

Modern slavery may sometimes be difficult to spot in a workplace setting. In some cases, bad actors will intimidate workers into staying silent. In others, a supplier may not be aware that actions they have taken—even those that are considered common practice in the geography or industry— are putting their workers at greater risk of modern slavery.

The below examples aim to illustrate how some common work practices can turn into situations of modern slavery. The text in bold font highlights parts of the worker’s story that indicate that they may be a victim of a form of modern slavery. These examples are fictionalized but are based on news stories.

Case Example #1: Commercial Fishing	
 <p>Types of Modern Slavery:</p> <ul style="list-style-type: none"> • Forced Labor • Labor Trafficking 	<p>Boran is a Cambodian national who finds a private recruiter promising to set him up with a factory job in Bangkok, Thailand, with free housing and good pay. However, Boran is responsible for all upfront costs, including travel, visa cost, and recruitment fees, and must pay back the loan offered by the recruiter with interest. Boran agrees, and he arrives in Thailand with a debt to the recruiter of USD \$1,000.</p> <p>Once in Bangkok, the attendee at the office takes his identification papers including his passport and says she will bring him to the factory. But instead, Boran is transported to an unregistered fishing boat, where he is locked below deck until the ship leaves the port. Boran is required to work on the ship in dangerous conditions on open seas for up to 20 hours per day, seven days a week, for six weeks, which is beyond local law governing working hours.</p> <p>Boran’s paycheck is held by his employer, making it impossible for Boran to pay off his debts to the recruiter. At six weeks into the job, Boran has still not received a single wage slip. When he asks his employer when he can return to land, he is beaten. Boran is forbidden to leave the boat when docked.</p>

How is Boran a victim of modern slavery?

Boran is a victim of forced labor, as he is forced to work under the threat of violence from his employer. As a Cambodian national working in Thailand, Boran is a migrant worker. Boran was falsely promised a different job than what he agreed to with the recruiter. Boran’s freedom of movement was curtailed as his passport was confiscated, and he is unable to leave the boat. Boran is also subjected to debt bondage as he was required to pay upfront costs for the job, and had his wages withheld by his employer, making it impossible to pay back the loan.

Boran is also a victim of labor trafficking, as he was transported to the fishing boat deceptively for the purpose of engaging in work.

Case Example #2: Forestry and Construction



Type of Modern Slavery:

- **Labor trafficking**

Daniel lives in a poor state in Brazil and feels burdened that he cannot earn enough money to support himself or his parents. A recruiter informs Daniel and other young men in his community that many of their neighbors have procured work inside a machine parts manufacturing facility in another state in Brazil which offers free housing and food. Daniel is pleased to learn of the job and leaves his family to join the recruiter. The **recruiter takes Daniel’s identification card** and buses him and the other men to a remote town in a neighboring state.

When he arrives, Daniel **is told he will be constructing a paper mill production facility**. Daniel is disappointed when he learns of this new job but **feels he does not have a choice but to sign the contract offered**. Daniel works long hours in the sun. Daniel resides in dormitory provided by his employer and **is required to return to the dormitory every evening to meet curfew**. His employer often delays paying him on time. When the facility is finally constructed, **the employer continues to hold onto Daniel’s identification card**.

How is Daniel a victim of modern slavery?

Daniel is a victim of labor trafficking, as he was involuntarily transported to a paper mill production facility under deception and for the purposes of work. While Daniel voluntarily took a job to work in another state, he did not agree to work at a paper mill production facility, which requires more manual labor than he imagined. Daniel is a migrant worker even though he did not cross an international border and speaks the local language. Being far from home makes Daniel vulnerable and isolated. Lastly, Daniel’s freedom of movement is curtailed as he is unable to move freely where he is housed and may feel compelled to stay until his employer returns his identification card.

Case Example #3: Hospitality



Types of Modern Slavery:

- **Sex Trafficking**

Leila is 13 years old and lives in the United States with her mom and three young siblings. Leila looks older than she is and is approached by a man who offers her a job as a maid in a motel which is forty-five minutes from her home. Leila’s mom needs the money, so Leila **takes a leave of absence from school to work full-time at the motel, where she is offered housing on site** since her mom does not have a car and it is difficult for Leila to commute from home.

On her first day, Leila’s boss shows her the motel room where she will be staying. He tells her that she can make extra money if she provides massages to motel customers. Leila politely declines. A week later, **her boss enters Leila’s motel room with a male customer and**

<ul style="list-style-type: none"> • Child Labor 	<p>demands that Leila provide the customer with sexual services. When Leila refuses, she is beaten. Leila mails the money she earns back to her mom but continues to stay and work at the motel cleaning and providing sexual services as needed because her boss threatens to call the police if she leaves or tells anyone.</p>
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How is Leila a victim of modern slavery?

Leila is a victim of sex trafficking. While she is voluntarily working as a maid at the motel, Leila is forced to perform sexual services under the threat of violence and is not empowered to refuse. Leila is also isolated, making her more vulnerable to abuse, as she is living in the motel controlled by her boss, and it is difficult for her to obtain transportation home.

Leila is also a victim of child labor, as she is under the age of 15, the minimum age for employment under international standards, is no longer attending school and is engaging in work that is harmful to her physical and mental well-being. Leila is also subjected to abusive working conditions at the motel and is separated from her family.

Case Example #4: Business Process Outsourcing



Type of Modern Slavery:

- **Forced Labor**

Amirah was recruited from Indonesia to work as an associate at a business process outsourcing company in Malaysia. While she received a detailed labor contract, it was written in English, and **Amirah did not understand all the details when she signed it.**

Amirah was flown to Malaysia by her recruitment agency but learned upon arrival that **she would be expected to pay for her own flight back home.** If she did not complete the terms of her contract, or if she performed below average, **Amirah’s employer would charge a penalty fee out of her wages for the week.** Telling Amirah that it was for her own protection, **her employer held onto Amirah’s passport.** Amirah is **not certain whether she would be able to return home on her own, without the permission of her company, or before she earns enough to pay for the return flight.** Amirah does not know anyone in Malaysia and is **not sure where she could go to ask questions about her rights at work.**

How is Amirah a victim of modern slavery?

Amirah may be a victim of forced labor. Amirah’s passport was retained by her employer making it difficult for her to return to Indonesia. As Amirah may need to perform work to pay for repatriation costs, she may be in a condition of debt bondage. The recruiter may have also taken advantage of Amirah’s language skills, as she did not understand the contract she signed. In addition, Amirah’s status as a migrant worker may make her feel isolated as she cannot rely on friends or family nearby for assistance.

IV. Where do the greatest risks of modern slavery exist for corporate suppliers, and what should suppliers do to identify, prevent, and address these risks?

Corporate suppliers may be expected to identify, prevent, and mitigate modern slavery risks in their operations and those of their business partners. If identified, suppliers are also expected to remedy impacts. This section offers step by step guidance on each of these actions.

Corporate suppliers may be expected by their customers to have in place procedures to identify, prevent, mitigate, and address human rights risks, including those related to modern slavery. Some corporate suppliers, such as small to medium-sized enterprises (SMEs) may have fewer resources and more informal processes to manage human rights risks than their multinational counterparts.^{xviii} Recognizing resource challenges and that processes and management structures may be more informal across smaller businesses, this section offers simple guidance to suppliers so they can quickly identify and assess the areas in their business operations and business partners which carry a high risk of modern slavery.

IDENTIFYING THE AREAS OF HIGHEST RISK¹

For corporate suppliers, the greatest risks of modern slavery generally lie in the:

1. Recruitment of workers by the supplier and through third-party staffing agencies (e.g., recruitment agencies, labor brokers).
2. Operations of the supplier, including working conditions.
3. Relationships the supplier has with business partners (i.e., sub-suppliers and contractors).

¹ For additional guidance on identifying the risk of modern slavery in recruitment, business operations and/or through business partners, see resources here: <https://www.gbcat.org/resources-for-suppliers>

Areas of Highest Risk of Modern Slavery for Corporate Suppliers

<p>Recruitment of Workers</p> <p>A business' use of migrant workers and reliance on third-party staffing agencies to source workers</p> 	<p>Business Operations and Working Conditions</p> <p>A business' labor practices when it comes to working hours, overtime, and wages of workers</p> 	<p>Business partners</p> <p>A business' relationship with third parties who may not be taking steps to identify or prevent situations of modern slavery from occurring</p> 
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The following sections explain the risks of modern slavery in each of these three areas and provide questions to help corporate suppliers consider where gaps may exist in their current policies and practices. Risk factors with an asterisk (*) refer to risks that may also be present in the operations of a supplier's business partner.

1) RECRUITMENT OF WORKERS

Corporate suppliers may rely on third-party staffing agencies such as labor recruiters or recruitment agencies to identify workers who have the skills needed for certain roles. While using a third-party to find workers is not wrong and may in fact be required by law in some geographies, it elevates the risk of modern slavery, as a supplier has limited visibility into the recruitment practices of the third-party and the experiences of the workers hired. Suppliers should pay attention to recruitment of migrant workers, as migrant workers are particularly susceptible to practices that may result in modern slavery, as described in Section III above. ^{xix}

Risk factor	Explanation of the Risk	Actions Suppliers Should Take
<p>Third-party staffing agencies (e.g., recruitment agencies, labor brokers) are used to find workers</p>	<p>Supplier has limited insight into the recruitment practices of third-party staffing agencies and the experiences of workers hired.</p>	<ul style="list-style-type: none"> ➤ Communicate your business' commitment to ethical recruitment (e.g., not charging illegal recruitment fees to workers) to existing and prospective third-party staffing agencies. ➤ Educate personnel handling recruitment on how workers hired through staffing agencies may be at higher risk of modern slavery. Request personnel to document the number of migrant workers hired into the business and by which third party staffing agency. ➤ Speak with workers hired through third-party staffing agencies to understand their recruitment experience, especially migrant workers. For example, aim to understand: <ul style="list-style-type: none"> ○ Fees, if any, paid to the third-party and the rationale provided.

- Terms and conditions included in the written contract.
- Conduct due diligence on third-party staffing agencies to understand how they recruit workers.
 - For example, whether the staffing agency is licensed and certified by a competent national authority and whether it has ever been blacklisted or fined for labor malpractice.
 - Request details on the specific policies and practices that aim to identify, prevent, and mitigate risks of modern slavery during the recruitment process.
 - Request details on how the staffing agency manages other risk factors identified in this section on “Recruitment of Workers.”
 - If this is a new staffing agency, request to speak with clients of the staffing agency to understand their experience in obtaining workers from the staffing agency and any potential concerns.

The terms and conditions of employment contained in the written contract are hard to understand or are different than what was previously agreed to*

Vague employment terms and workers’ low level of awareness of their rights can place workers in precarious situations. For example, workers may be forced to sign an employment contract in a language he or she does not fully understand. Additionally, some workers may agree to certain terms of employment in a contract with the supplier but may later find out that the terms of the contract are different than what was presented by the third-party staffing agency.

Migrant workers who agree to certain terms before they leave home only to learn of contract changes once they arrive in the place of work may be vulnerable if they are

- Provide all workers with a written contract in their native language.
- The written contract should contain rights and responsibilities of the job for which the worker is being hired, information regarding wages, frequency of wage payments, working hours, overtime terms, location of work, working conditions, and guidance on termination of employment.
- Explain the contract and terms to job applicants to ensure they understand all requirements.

now forced to take on debt to pay for the job.

<p>The ages of workers are not verified*</p>	<p>Individuals seeking employment who may appear to look eligible to work may in fact be children below the legal age of full-time employment. Employing children constitutes modern slavery.</p>	<ul style="list-style-type: none"> ➤ Require all workers to meet the minimum working age under national legislation, but in no case less than the ILO general minimum age – regardless of local custom or laws. ➤ Request and maintain a photocopy of all documentation necessary to confirm and verify the date of birth of all workers, such as birth certificates and national identification cards. ➤ Individuals involved in recruiting workers, including those within the supplier’s business and at third-party staffing agencies should conduct an interview (in-person or virtual) with the job seeker to visually check the job seeker against the documentation received.
<p>Recruitment fees or related costs are charged to workers (including migrant workers) either directly by the supplier or by the third-party staffing agency*</p>	<p>The payment of recruitment fees and costs associated with employment (e.g., transportation, visa, medical), termination and repatriation can place workers in debt bondage, which may amount to modern slavery. Migrant workers who are often hired through third-party staffing agencies are particularly vulnerable.</p>	<ul style="list-style-type: none"> ➤ Hire workers directly and locally where possible. ➤ When using third parties to fulfill staffing needs, implement controls to ensure that they do not charge any fees to job applicants unless legally required. ➤ If a third-party must charge fees, communicate that the fees charged to the workers must not be above the legal amount allowed, and must be disclosed to the business. ➤ Pay for all costs and fees associated with recruitment and travel of migrant workers from their home to the workplace (e.g., visa, work permit, transportation, medical) ➤ Pay for all costs and fees associated with repatriation of migrant workers. ➤ Fully reimburse workers for any fees previously charged as soon as practicable. ^{xx} ➤ Speak with workers to understand their recruitment process and any fees charged by third-party staffing agencies. ➤ Do not charge fees as a disciplinary action, or at contract termination if the worker has provided full notice. ➤ Compile a list of the geographies which have laws or regulations which charge migrant workers fees and cross-check this list when using third-party staffing agencies to help identify future risk.

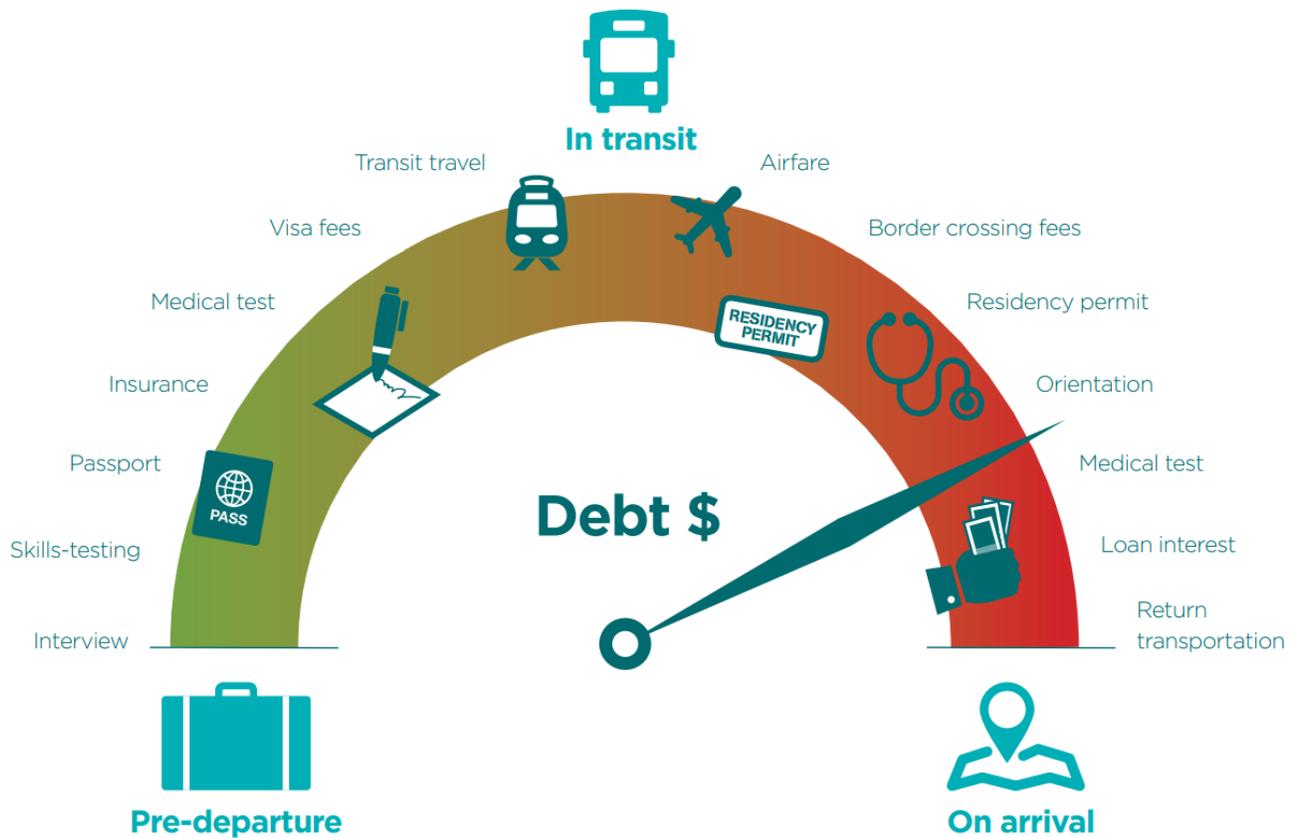
The Employer Pays Principle: No worker should pay for a job.

The costs of recruitment should be borne not by the worker but by the employer.

Reflecting the Dhaka Principles for Migration with Dignity, adoption of the Employer Pays Principle is fundamental to combatting exploitation, forced labor and trafficking of migrant workers and represents an important step in achieving the UN Sustainable Development Goal of decent work for all.^{xxi}

Migrant Worker Recruitment Fees: The Increasing Debt Burden^{xxii}

Below are fees that migrant workers may encounter in their recruitment process.



2) OPERATIONS AND WORKING CONDITIONS

A corporate supplier through its own business practices may inadvertently place workers in situations of modern slavery. Below are the most common examples.^{xxiii}

Risk factor	Explanation of the Risk	Actions Suppliers Should Take
Workers live in accommodations provided by the supplier*	<p>There is a risk that a supplier which provides housing to workers, generally migrant workers, may be exerting control over them and limiting their ability to move freely. A supplier may be limiting the freedom of movement of workers if it monitors workers' movements, implements a curfew, or limits workers from leaving the worksite without permission.</p> <p>A supplier or a supplier's agent may take advantage of workers, requiring them to perform commercial sex acts to reside in the accommodation.</p>	<ul style="list-style-type: none"> ➤ Communicate to workers that they are welcome to freely move outside of the housing accommodations, without scrutiny or permission. ➤ Do not monitor the movement of workers. ➤ Refrain from implementing a curfew in the accommodations unless there is a practical reason for doing so (e.g., it is unsafe in the nearby community). If there is a good reason for the curfew, communicate this rationale to workers for transparency. ➤ Speak with workers, especially female workers, to better understand their living conditions and any safety or security concerns they may have. ➤ If sex trafficking is suspected, collect information on the circumstance and call a non-emergency police line, or share information with a human trafficking hotline.
Workers' wages are withheld, delayed, or reflect wage deductions* or a supplier instructs a third-party staffing agency to pay workers	<p>Workers rely on steady and accurate wages to support themselves and/or their families.</p> <p>Delaying wages payments, wrongfully deducting wages or more egregious practices such as withholding wages or paying in cash-alternatives such as coupons or gift certificates increase the vulnerability of workers to modern slavery.</p> <p>A supplier may request a third-party to pay workers'</p>	<ul style="list-style-type: none"> ➤ Pay wages to all workers, especially temporary and migrant workers, on a timely basis and directly to a worker's bank account. ➤ Compensate workers for overtime at greater than regular hourly rates, and according to national law. ➤ For each pay period, provide workers with clear wage slips which reflect work performed, deductions made, and overtime worked. ➤ Do not deduct pay from wages as a disciplinary measure. ➤ Ensure details about wages and overtime are included in the written contract provided to workers.

wages. In some cases, third parties may retain the wages, or a portion of the wages owed to workers, creating a situation that may amount to modern slavery.

Workers are required to work beyond the working hours set by national law (mandatory overtime) and/or do not receive overtime pay*

A supplier may require workers to work long hours with no or limited rest, which may result in negative health and safety outcomes (e.g., increased accidents). This practice may also be considered modern slavery if a supplier sets wages so low that workers must work overtime to earn a wage to provide for necessities.

Female workers who work overtime into evening or early morning hours may be at greater risk of sexual and physical abuse if they are unable to secure safe transportation to/from home.

- Pay workers a wage that does not require them to work overtime to maintain a normal standard of living.
- Do not allow workers to work more than the maximum working hours set by national law, including overtime.
- Ensure all overtime labor is voluntary, and do not require overtime for a worker to retain his or her job.
- Do not retaliate against workers for refusing to work overtime (e.g., by deducting wages).
- Provide workers with regular breaks.
- Provide workers at least one day off for every seven days worked, or the minimum set by national law (whichever is higher).
- Provide workers, especially female workers, who work overtime with transportation home.

A supplier or third-party staffing agency retains the identity documents or personal possessions of workers*

Identity documents such as passports, work permits, residency permits, identity cards and birth certifications enable workers to move freely. This is especially the case for migrant workers who need many of these documents to cross international borders. When a supplier or third-party staffing agency holds onto these documents, workers may feel unable to leave the job or seek new employment without

- Ensure that all workers possess and retain control of their identifying and/ or working documents during the recruitment process as well as during employment.
- If a worker's personal information or identity documents are needed, obtain consent to make photocopies of the documents and promptly return the original documents to the worker.
- Ensure workers have unrestricted and immediate access to their personal possessions and identity documents.
- Provide individual lockers or storage space in a secure location where workers can place their personal belongings and identity documents and which are accessible anytime, without permission. The lockers or storage spaces should be in locations which are well-lit so female workers feel safe.

abandoning these important documents.

Workers do not have access to a channel to raise complaints*

A complaint mechanism enables workers to raise concerns to the business, which may provide insight into potential or actual modern slavery taking place. A supplier without such a mechanism may not be able to effectively manage modern slavery risks.

- Develop and promote a complaint mechanism, as outlined in “Recommended Procedures and Policies – Complaint Mechanism.”
- Conduct training for workers on the complaint mechanism. See box below titled “Training on the Complaint Mechanism” for details that should be covered in the training.

3) Business partners

A corporate supplier may be implicated in financial, legal, or reputational risk if a business partner, such as a sub-supplier or contractor, is engaged in modern slavery practices. Situations of modern slavery may arise from poor human resources planning (e.g., there is not enough staff to complete work), last-minute client requests, or demand around peak manufacturing times (e.g., holiday season). In some cases, business partners may feel compelled to quickly hire new workers with limited insight into how these workers are recruited by a third-party staffing agency or may require their existing workers to work more hours than permitted under national and international law without overtime pay.

For most corporate suppliers, it is not practicable to assess how all business partners may be identifying, preventing, and addressing modern slavery risks. A supplier should thus prioritize for assessment those business partners which are based in geographies or sectors where the risk of modern slavery is high, those which use third-party staffing agencies to find workers, and those which are most critical to the supplier’s operations (e.g., the business partner provides a large volume of products/raw materials and/or provide high spend). For those select businesses, the supplier should aim to understand the modern slavery risks that may be associated with the relationship. These include, for example, risks associated with the business partner’s workforce (e.g., it is largely composed of low-skilled or migrant workers), and working conditions (e.g., workers are subjected to excessive work hours, workers are denied bathroom breaks). In addition to the risks identified in Sections I and II (see asterisks), other prominent risks suppliers should look for when assessing business partners are included below.

Risk factor	Explanation of the Risk	Actions Suppliers Should Take
Business partner has limited understanding of what modern slavery means and its risks.	A business partner that is unfamiliar with modern slavery and its risks will be unable to identify as well as prevent and mitigate situations of modern slavery.	➤ Share this document with your business partners to help them understand what modern slavery is, common indicators, and the steps they can take to identify, prevent, and address modern slavery within their operations and those of their business partners.

<p>Business partner lacks a policy or process to identify and prevent modern slavery risks</p>	<p>A business partner that lacks a policy or process to consider modern slavery risks will likely be unable to identify, prevent or address a situation of modern slavery if it occurs.</p>	<ul style="list-style-type: none"> ➤ Encourage business partners to develop a simple policy prohibiting the use of modern slavery in their operations and in the operations of their business partners. ➤ Encourage business partners to speak with their workers to better understand concerns about their recruitment process (e.g., did they pay fees?) as well as their working or living conditions. ➤ Encourage business partners to have in place an anonymous complaint mechanism that enables workers to raise concerns, including related working conditions and recruitment. Encourage business partners to conduct training on the mechanism based on guidance in this toolkit. ➤ Periodically assess business partners and track their management of modern slavery risks using sample Key Performance Indicators covered later in this toolkit.
<p>Business partner uses a third-party staffing agency to find workers</p>	<p>The business partner may have limited insight into the recruitment practices of the third-party staffing agency, and the experiences of workers who may have been recruited through the agency.</p>	<ul style="list-style-type: none"> ➤ Refer business partners to section above on “Recruitment of Workers” for guidance.
<p>Business partner operates in an industry or geography known to be high-risk for modern slavery and/or sources goods or services from businesses located in industries or geographies known to be high-risk for modern slavery</p>	<p>A business partner’s sourcing practices as well as those of its sub-suppliers can still pose financial, legal, and reputational risk.</p>	<ul style="list-style-type: none"> ➤ Require business partners to conduct due diligence to better understand the management practices of their suppliers, especially those based in geographies and/or industries known to be at high-risk for modern slavery (see Section “Recommended Procedures and Practices – Due Diligence”). ➤ Encourage business partners to share this toolkit with their suppliers.

PREVENTING RISKS FROM OCCURRING²

Beyond understanding indicators of modern slavery and high-risk areas associated with modern slavery, a corporate supplier should have appropriate policies and procedures in place to prevent modern slavery from taking place.

Recommended Policies

1. **Business Code of Conduct:** A Business Code of Conduct communicates the values of your business and how your business operates. At minimum, the Business Code should state that your business does not tolerate any form of modern slavery and that your business will train relevant staff to identify indicators of modern slavery. The Business Code should also acknowledge that your business will conduct training for staff on any changes made to the policy to raise awareness and ensure compliance.
2. **Supplier Code of Conduct:** A Supplier Code of Conduct communicates your expectations of your business partners (i.e., suppliers and contractors). At minimum, the Supplier Code should prohibit business partners, from engaging in any form of modern slavery. The Supplier Code should also cover working conditions and worker treatment.

Recommended Procedures and Practices

1. **Due diligence:** Beyond a policy commitment to not engage in modern slavery, a supplier is expected to take steps to identify, prevent and manage risks related to modern slavery. Suppliers should look for indicators of modern slavery discussed in this toolkit in their own operations and in the operations of their business partners. If an indicator or indicators is present, a supplier should investigate the reason for the presence of the indicator or behavior (e.g., explore why human resources may be holding onto a worker's passport) by engaging in dialogue with relevant staff and workers, if appropriate.

When it comes to the operations of a business partner, a supplier will likely not be able to ascertain situations of modern slavery taking place within the business partner's workforce. Given this, a supplier should encourage business partners to develop their own grievance mechanisms so their workers can raise concerns. The supplier can then work with the business partner to discuss complaints raised by workers, and monitor any risks using key performance indicators (see section below).

2. **Complaint mechanism:** A supplier should offer workers a safe and confidential means to raise concerns without fear of retaliation from management. A complaint mechanism can help improve the living and working conditions of workers. If effective, it can also help manage reputational risk, as concerns can be addressed privately instead of publicly.

A grievance mechanism can be a hotline or suggestion box which workers can use to anonymously submit concerns. To be effective, the mechanism should meet the criteria below based on the UNGPs. ^{xxiv}

- **Legitimate and Trustworthy, and based on Engagement and Dialogue:** The supplier should involve workers in the design of the mechanism, such as the placement of the complaint box. Female workers should provide input on the mechanism to ensure it is trusted by women.
- **Accountable and Compatible:** The supplier should communicate to all workers that it will not interfere with the complaint process once a complaint is entered, and that all complaints will be treated seriously.

² For additional guidance on recommended policies, procedures and practices, and examples of business and supplier codes of conduct, see resources here: <https://www.gbcat.org/resources-for-suppliers>

- **Accessible and Equitable:** The supplier should publicize the existence of the mechanism to all workers, including temporary and migrant workers, how it can be used, and the types of concerns that may be raised. The supplier should also communicate that submissions can be anonymous and are confidential, and that workers who use it will be not retaliated against by management. Communication about the mechanism should be described in simple terms for workers with limited literacy and provided in all the languages spoken and read by workers.
 - **Predictable:** The supplier should indicate how grievances are handled, including the time frame when an outcome may be available.
 - **Transparent:** The supplier should share progress made in resolving grievances with workers for transparency.
 - **Source of Continuous Learning:** The supplier should analyze any patterns or causes of concern raised by workers, and update processes to prevent or eliminate similar concerns from being raised.
3. **Key Performance Indicators:** A supplier should develop key performance indicators to track progress on modern slavery prevention efforts. Sample indicators may include the number of individuals trained on modern slavery indicators per year, the number of complaints issued by workers which include indicators of modern slavery and associated trends (e.g., is retention of identity documents a common issue based on the complaints received?). Other indicators may be the number of assessments conducted for modern slavery risks internally, as well as assessments conducted within the operations of business partners.
 4. **Trainings for Staff:** A supplier should conduct training for all workers, including temporary workers and migrant workers on the Business Code of Conduct as well as the complaint mechanism. See below for content that should be covered in these trainings.

Training on the Business Code of Conduct

The training should be directed at workers who manage areas that carry a high-risk of modern slavery, including, but not limited to, recruitment, payment of wages, worker accommodations, overtime shifts, and relationships with business partners.

The training should cover at minimum:

- What modern slavery is and its relevance to the business
- Relevant indicators associated with forms of modern slavery
- The business' grievance mechanism and reporting procedures to address situations of modern slavery
- Ways in which the business is aiming to prevent modern slavery from taking place within its operations and those of its business partners
- Relevant national law related to modern slavery, especially responsible recruitment, wage payment practices and workers' rights (i.e. freedom to leave)

Training on the Complaint Mechanism:

A supplier should conduct training for all workers on the complaint mechanism and how it works. The training should cover at minimum:

- how the complaint mechanism was developed (e.g., in consultation with workers)
- the types of concerns that may be raised through the mechanism
- how to submit a complaint
- details on the timeline and process from complaint initiation to resolution, including the timeline that management will follow
- the anonymous and confidential nature of submissions made through the mechanism
- the business' commitment to not retaliate against workers who submit a complaint.

5. **Ongoing engagement with workers:** A supplier should aim to maintain regular discussion with workers, especially women, ethnic minorities, and migrant workers, to understand the challenges they may face in the workplace. Discussions may be held individually if workers are comfortable sharing their experiences, in small group settings, and/or through worker committees or trade union representatives, if available. As female workers may feel uncomfortable sharing challenges with male counterparts or supervisors, a female supervisor or manager should be called upon to engage directly with female workers.
6. **Knowledge-sharing with business partners:** A supplier should share this toolkit with key business partners to help them understand what modern slavery is, what modern slavery indicators look like, and the steps they can take to prevent and address potential and actual risks.
7. **Partnership Opportunities with External Stakeholders:** A supplier should consider partnership opportunities with support service organizations, civil society organizations and industry associations that can help enhance a supplier's understanding of modern slavery risks and assist in addressing any risks once identified. Some organizations are skilled at speaking with workers in their native languages to help identify issues before they escalate and can support victims of modern slavery if identified.³

ADDRESSING RISKS OF MODERN SLAVERY⁴

A supplier should have in place a process to respond to a situation of modern slavery if it arises. Having a proactive approach can help the business better manage financial, legal, or reputational exposure while protecting victims.^{xv} It is recommended that suppliers identify partners and support services organizations that can assist vulnerable workers and survivors in advance of any incidents. Support service partners can help to ensure that victims can

³ See the Interactive Map for Business of Anti-Human Trafficking Organizations for organization that can assist suppliers on anti-slavery efforts: www.modernslaverymap.org

⁴ For additional guidance on addressing the risk of modern slavery, see resources here: <https://www.gbcat.org/resources-for-suppliers>

access critical services, such as healthcare, legal advice and representation, police services, and financial and housing assistance, as necessary.^{xxvi}

1. **If a victim of modern slavery is identified within your business:**

- Determine who will be responsible for engaging with the victim and ensuring remediation.
- Ensure anonymity and confidentiality to the greatest extent possible. Ensure the victim will be supported and protected through the process and not be retaliated against for raising the issue.
- Partner with trusted local stakeholders (e.g., support services organizations, including healthcare services) who can assist you.
- Determine how best to provide remedy to the victim, including but limited to the below options:
 - reimbursement of recruitment fees or illegal deposits.
 - compensation for lost wages or illegal wage deductions.
 - compensation for pain and suffering endured; and
 - assistance with repatriation, if desired.
- Recognize that the victim may still wish to keep his or her job, as he or she may be the sole income generator for their family or for other personal reasons.
- If remaining at the business is not appropriate, support the victim in finding safe employment elsewhere.
- If the situation involves criminality or violence, the case should be referred to national authorities (where this is seen as viable). It should be understood whether referrals will put victims (and their families) at risk of further harm.^{xxvii}

2. **If a victim of modern slavery is identified within the operations of your business partner:**

- Work with your business partner to follow the steps identified above, provided however doing so will not put the victim at increased risk of harm.
- If working with the business partner may place the victim at increased risk of harm, consider contacting local support service organizations for assistance.

3. **If you encounter a situation of modern slavery outside the operations of your business and business partner:**

- Report the situation to the local police, provided doing so will not subject the victim to additional harm or punishment and the police are not known to be corrupt.
- Help facilitate or provide the victim with access to compensation.
- Support the victim in finding safe, alternative employment.

A supplier should conduct regular checks to ensure that improvements made to the business' approach in identifying, preventing, and addressing modern slavery remain effective. The supplier should aim to document findings and the results of any corrective action taken.

CONTACT

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A BSR COLLABORATION

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- ⁱ The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights.
- ⁱⁱ ILO Declaration on Fundamental Principles and Rights at Work, <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>
- ⁱⁱⁱ UK Modern Slavery Act and the Australia Modern Slavery Act
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- ^v ILO Indicators of Forced Labour, https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf, and the ILO Global Business Network on Forced Labour Operational Indicators of Forced Labor
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- ^{xii} Ibid.
- ^{xiii} UNODC, Definition of human trafficking - <https://www.unodc.org/unodc/en/human-trafficking/what-is-human-trafficking.html>
- ^{xiv} <https://www.ilo.org/ipec/facts/lang--en/index.htm>
- ^{xv} Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, [C182 - Worst Forms of Child Labour Convention, 1999](https://www.ilo.org/Conventions/182)
- ^{xvi} US Department of Labor, 2018 List of Goods Produced with Forced or Child Labor (2018), <https://www.dol.gov/sites/dolgov/files/ILAB/ListofGoods.pdf> and Verite, Strengthening Protections against Trafficking In Persons in Federal and Corporate Supply Chains (2017), <https://www.verite.org/wp-content/uploads/2017/04/EO-and-Commodity-Reports-Combined-FINAL-2017.pdf>
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