Modern Slavery Global Benchmark 2025

GOOD INVESTMENT

Contents

CCLA Modern Slavery UK Benchmark 2025

This report frequently refers to the CCLA Modern Slavery UK Benchmark 2025, which is available on our website.

Illustrations by Pamela Bentley

Acknowledgements

We would like to thank a number of people for their support and engagement with the process of developing and publishing this benchmark.

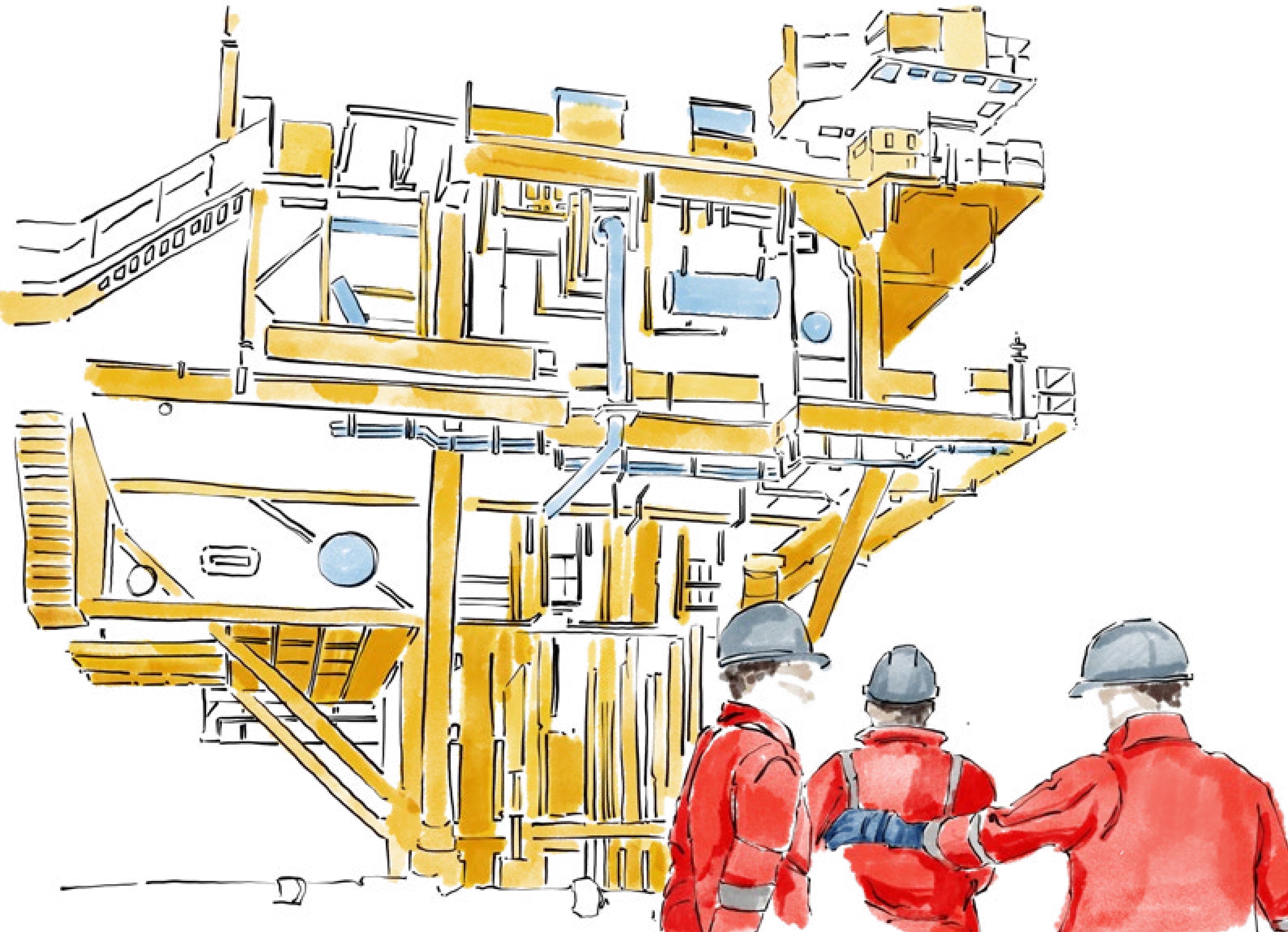
Firstly, we would like to thank Sophie Walk for her project management and stewardship of the research. We would also like to thank Ross Albany-Ward, Julia Chen, Emily Christaki, Britt Dewing, Joseph Hanley and Constance Harrop. Additionally, we thank Victoria Davies, Joe Frater, Amiya Taggart and Ben Wilmot at Canbury for all of their support and advice, and for the development of the large language model used in the preliminary analysis of company disclosures.

Secondly, we would like to thank the members of the Find it, Fix it, Prevent it Steering Group: Paolo Camoletto (Diocese of Westminster), Rosey Hurst (Impactt), Elaine Mitchell-Hill (Design for Freedom), Archie Pearson (Rathbones Group), Bettina Reinboth (United Nations Principles for Responsible Investment), Nathalie Ritchie (CEF), Victoria Sant (Investor Forum) and Subhan Ullah (University of Nottingham Rights Lab).

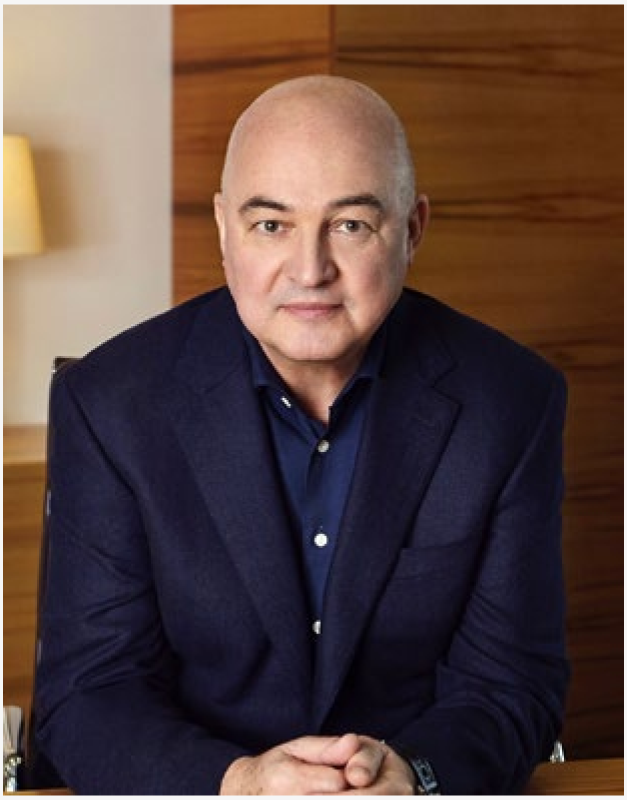
Thirdly, the 27 benchmarked companies that took the time to engage with the assessment process.

Finally, we would like to thank Peter Hugh Smith, Dr James Corah, Amy Browne and the wider team at CCLA for their ongoing support of our work on modern slavery.

The construction, scoring and compilation of the benchmark remain the responsibility of CCLA.



Foreword



Throughout my career at Unilever, ultimately as the CEO, I was proud of the standards that the company operated to and specifically the work that we did to address modern slavery risks in our organisation and supply chains. However, over the past two years I have become more focused on these challenges as a commissioner of the Global Commission on Modern Slavery and Human Trafficking, leading the Commission's work on corporate supply chains. The number of cases of forced labour in supply chains is rising and business leaders need to ensure that their success is not built on the exploitation of others.

Under the leadership of Baroness May of Maidenhead, we published our first major report, 'No country is immune: working together to end modern slavery and human trafficking', earlier this year.[1] One of our recommendations is that the UN Guiding Principles on Business and Human Rights (UNGPs) should be the foundation for how governments and companies should address forced labour in supply chains.[2]

This benchmark report assesses the extent to which global companies operating in the UK comply with UK legislation and guidance, and I am pleased to see that this benchmark also uses the UNGPs to assess company disclosures. It shows a significant range in performance across companies – from 2% to 85%. This illustrates the limitations of the current legislation, which focuses on reporting voluntary efforts to identify and reduce risk. The Commission's report recommended that governments should move beyond voluntary measures and enact well-designed legislation mandating human rights due diligence and so drive meaningful corporate action across the board. I note that CCLA has made a very similar recommendation to government about the need to mandate human rights due diligence in this report.

While we are agreed that new legislation is required, it is encouraging to see CCLA using the current legislation to hold global companies to account.

I warmly welcome this first modern slavery benchmark of the top global companies. The assessments show that only five companies are in the top tier, and the average score of 45% is considerably lower than the average score of 60% for UK companies. The report also shows that even among top companies, there is considerable room for improvement, particularly when it comes to remediating victims for the harms they have suffered.

Alan Jope
Global Commission on Modern Slavery and Human Trafficking and former CEO of Unilever

Executive summary

Modern slavery is a serious abuse of human rights encompassing several forms of exploitation, including forced labour, human trafficking, servitude and forced marriage. Eradicating modern slavery has been set as a target in the UN Sustainable Development Goals (target 8.7), and its achievement will require dedication, innovation and collaboration.

There is huge potential for companies' actions to reduce modern slavery globally. Given the scale of forced labour and its prevalence in the private economy, CCLA believes that all large, listed companies are exposed to the risk of modern slavery through their global operations and supply chains.[3] Companies can therefore implement policies to actively find, fix and prevent modern slavery and set corporate and industry standards with their good practice. We recognise, of course, that some companies are more exposed to the risk of modern slavery than others; however, whatever their level of exposure, companies can take additional steps to strengthen their approach.

In May 2025, CCLA published a Modern Slavery Global Benchmark pilot to ascertain whether the methodology developed for the UK benchmark in 2023, partially based on the UK Modern Slavery Act 2015[4] and the corresponding UK Home Office guidance,[5] could be applied to global companies. These companies often have more complex legal structures and are subject to human rights reporting obligations across multiple jurisdictions, of which the UK is just one.

We concluded from the pilot that not only could the methodology be applied to global companies but also many global companies would welcome the benchmark and investors' engagement on modern slavery. However, given the pilot's purpose as a broad landscape review and the fact that methodological improvements have since been made, we will not be incorporating a comparison of the two datasets in this report.

We are proud to publish the first CCLA Modern Slavery Global Benchmark report. It has been designed to objectively assess how listed companies publicly disclose their approach and the efforts they make to manage modern slavery. The report also hopes to encourage improved practice.

The CCLA Modern Slavery Global Benchmark is also a tool for investors. CCLA believes that investors have a key role to play in helping companies and other stakeholders to deliver systemic change in the fight against modern slavery. As stewards of business, investors can work with business leaders and engage with companies to ensure that better practices are normalised and incentivised.

The benchmarks provide investors with a regular, consistent assessment of companies' modern slavery commitments and practices, highlighting where there has been progress and where more work is needed. From speaking to investors and companies, we know that investors from the Find it, Fix it, Prevent it coalition have been using the benchmarks in their engagements with companies profiled within it.

In 2025, we reviewed the public disclosures of 111 globally listed companies to evaluate their approach to finding, fixing and preventing modern slavery. This report details our findings from that benchmarking process.

Although we are pleased to see the breadth of companies reporting in line with global human rights legislation, we will only get so far with transparency legislation (such as the Modern Slavery Act) combined with investor pressure. To effectively reduce the numbers of people in forced labour around the world, a suite of policy tools is required. CCLA supports the conclusion of the Joint Committee on Human Rights that 'there is currently a piecemeal and ad hoc approach to addressing forced labour using domestic policy'.[6]

The benchmark

The CCLA Modern Slavery Global Benchmark has been developed in support of Find it, Fix it, Prevent it – a collaborative investor initiative on modern slavery with 70 members and £13 trillion in assets under management.*

The benchmark assesses the modern-slavery-related disclosures of the largest globally listed companies on the degree to which they:

- conform with the requirements of Section 54 of the UK Modern Slavery Act 2015
- disclose information aligned with the UK Home Office guidance on modern slavery[7]
- report on finding, fixing and preventing modern slavery.

The benchmarked companies consist of the top 100 non-UK-listed companies by market capitalisation as of 31 March 2025, plus 11 additional companies that were assessed in the pilot and have been retained for ongoing analysis. UK companies in the global 100 were assessed in the CCLA Modern Slavery UK Benchmark.

*As at 31 December 2025. Figures updated annually.

This is the first time CCLA has conducted the Modern Slavery Global Benchmark. The aims of the benchmark are to:

1. develop a framework on the degree to which companies are active in the fight against modern slavery
2. create an objective assessment of corporate modern slavery performance aligned with statutory requirements, government guidance, and international voluntary standards on business and human rights
3. support investors' engagement with companies on their approach to modern slavery
4. provide a vehicle for learning and sharing good practice
5. create a mechanism to leverage business competition to drive improvement in practice.

The companies have been assigned to one of five performance tiers to reflect the maturity of their approach to modern slavery. The results of the CCLA Modern Slavery Global Benchmark 2025 can be found on page 16 of this report. The full benchmark methodology and framework can respectively be found in Appendix 1 and Appendix 3 of this report.

In March 2025, the Home Office updated its 'Transparency in supply chains' statutory guidance, significantly raising the standards for corporate human rights reporting and due diligence.[8] As part of this process, CCLA sat on a Forced Labour Forum with other representatives from government, civil society, business and academia. Subsequently, we reviewed the updated guidance to ensure that our framework is aligned with the new expectations. The updated assessment criteria will be published in January 2026.

Performance summary 2024–2025

Of the 111 benchmarked companies:

5

rank in the top performance tier

These companies are leading on human rights due diligence with discussions of meaningful activities to find, fix and prevent modern slavery. They are concentrated in the consumer staples, information technology and materials sectors.

48

rank in the bottom two performance tiers

These tiers are respectively categorised as ‘developing approach’ and ‘unsatisfactory’ showing that there is much global companies can do to improve their reporting and approach to modern slavery.

45

was the average percentage score

This puts the average company in tier 3, which means it is ‘meeting basic expectations’.

13

had not published a UK modern slavery statement that covered all their UK operations

This demonstrates that the UK Home Office needs to clarify which global companies are in the scope of the Modern Slavery Act 2015.

Engagement summary

Since the publication of the pilot benchmark in May 2025, 24% of the assessed companies have engaged with the benchmarking process. Of these 27 companies:

- 8 both directly engaged with CCLA to discuss how to improve their modern slavery disclosures and reviewed their preliminary assessment.
- 12 only reviewed their preliminary assessment, with many providing substantive feedback.
- 7 directly engaged with CCLA to discuss how to improve their modern slavery disclosures but did not review their preliminary assessment.

Key emerging themes

1 There is a compliance gap between UK-listed and global companies

Global companies underperform their UK counterparts on the 'UK Modern Slavery Act compliance and registry' section of the benchmark with an average score of 63%, compared with 92% for UK companies. This 29% gap likely reflects the fact that global companies have many human rights reporting requirements and may be less familiar with the details of how to comply with the UK Modern Slavery Act 2015. Furthermore, companies without a UK website are less likely to meet the requirement for the modern slavery statement to be clearly linked on their homepage.

2 Companies still score higher on compliance and conformance with statutory guidance than on the voluntary performance metrics

The average score for 'UK Modern Slavery Act compliance and registry' was 63% and the average score for 'Conformance with UK Home Office guidance on modern slavery' was 62%. These findings contrast with those for the three other sections of the benchmark – 'Find it' (38%), 'Fix it' (18%) and 'Prevent it' (41%) – which are based on the UN Guiding Principles on Business and Human Rights and other international best practice standards.[9] This is a pattern we have seen in every benchmark conducted since 2023 – both the three UK iterations and the global pilot.

3 Performance scores varied significantly between the leaders and laggards

The benchmark shows a large gap between the best performers, which scored up to 85%, and the worst-performing company, which scored 2%. The average benchmark score was 45%, meaning that there is significant room for improvement in corporate reporting and human rights due diligence.

4 Country performance is likely linked to human rights legislation

The data indicates a correlation between companies that perform well on the benchmark and their listing in countries with more comprehensive human rights legislation. More comprehensive legislation seems to lead to better practice. We can infer that companies are willing to respond actively when guidance is given and we would therefore like to see cohesive human rights legislation become a more urgent global priority.

5 A quarter of companies found cases of modern slavery

In total, 27 companies (24%) – across consumer discretionary, consumer staples, financials, health care, information technology and materials – disclosed finding modern slavery in their operations or supply chains. This level of transparency should be recognised and encouraged, given the business concerns of flagging human rights risks. Furthermore, 82% of this group outlined the steps they had taken to end and mitigate ongoing risks. This suggests that once cases have been identified, companies are moving to address them and provide remedy.

Recommendations

Based on the analysis of the benchmark and the themes that emerged, we make various recommendations for companies, investors and policymakers.

Companies

- Ensure human rights reporting meets the requirements of all jurisdictions in which the business operates, including the UK.
- Become familiar with the scope of the UK Modern Slavery Act and the new UK Home Office guidance on transparency in supply chains and conduct a gap analysis at least against the new Level 1 requirements, which have been strengthened.[10]
- Ensure there is strong internal governance on modern slavery – including responsibility at board level and appropriate committees or structures – and be sure to include workers' and relevant stakeholders' perspectives.
- Conduct and disclose detailed operational and supply chain risk assessments. These should include forced labour risks across supply chain locations (beyond tier one) and, importantly, direct operations. Risk assessments should go beyond desk-based assessments to include engagement with people at risk of modern slavery.
- Disclose and provide details of suspected cases of modern slavery, the steps that have been taken to provide remedy for victims, and the outcomes of this process.
- Adopt and disclose responsible procurement practices that enable suppliers to uphold the standards that are in the company's supplier code of conduct and in line with international best practices.

Investors

- Use the CCLA Modern Slavery Global Benchmark 2025 framework in engagement with portfolio companies to identify areas where a company is not performing well and where it can take additional steps.
- In line with CCLA's own practices, consider voting against the financial statements and annual reports of those companies that are in performance tiers 4 or 5 and that do not respond positively to engagement.
- Consider joining collaborative investor engagement programmes such as Find it, Fix it, Prevent it and Rathbones' Votes Against Slavery campaign.[11]

Policymakers

- Provide guidance to global companies to help them decide whether they should report at the subsidiary or group level.
- Mandate companies with UK operations to upload their modern slavery statements to the UK government's Modern Slavery Statement Registry and make it clear that global companies need to comply as well as UK registered companies.[12]
- Ensure that legislation on modern slavery disclosures mandates financial institutions to report on their investing and lending portfolios.
- Introduce mandatory human rights due diligence legislation and align the UK's human rights expectations with international obligations on human rights.

Companies, investors and policymakers

- Closely monitor developments in legislation on corporate sustainability due diligence in the European Union and import bans both there and in the United States.

Modern slavery global trends

Modern slavery is a critical global crisis. Current estimates indicate that 50 million individuals are trapped in modern slavery, with 28 million of these victims in forced labour. And this figure is not static; it is growing.[13]

Forced labour is a fundamental violation of human rights and an economic crime. It generates an estimated $236 billion in illicit profits annually.[14] These profits are directly derived from the coercive exploitation of vulnerable people, representing wages stolen from individuals often struggling to support their families. For migrants, this translates to lost remittances. For governments, it represents significant uncollected tax revenue.

The private economy is implicated, accounting for 86% of all forced labour. This exploitation is systemic, with four broad sectors – industry, services, agriculture and domestic work – accounting for 89% of all victims.[15] The profits from forced labour create a powerful incentive for further exploitation, strengthening criminal networks, fostering corruption and systematically weakening the rule of law.

The moral imperative to act is matched by an undeniable economic case. Analysis by the International Labour Organization provides a clear cost–benefit framework. The one-time cost of implementing key interventions to eliminate forced labour is estimated at $212 billion, or a modest 0.14% of global GDP. The return on this investment would be substantial. Releasing 28 million people from forced labour and integrating them into the formal economy would generate an estimated $611 billion in additional global GDP.[16] This represents a threefold return on investment. Eradicating forced labour is not a cost but a critical investment in global economic stability and human dignity.

The current landscape of corporate human rights reporting is undergoing a significant transformation, moving from voluntary principles to mandatory legal obligations. This shift is primarily being driven by a wave of legislation and regulation, investor pressure, and a broadening understanding of corporate responsibility.

The most critical development is the European Union's regulatory framework. The Corporate Sustainability Due Diligence Directive (CSDDD), which entered into force in July 2024, establishes a legal requirement for large companies operating in the European Union to conduct human rights and environmental due diligence across their 'chain of activities'.[17] This effectively legally mandates the processes previously outlined in the voluntary UN Guiding Principles on Business and Human Rights. The CSDDD is complemented by the Corporate Sustainability Reporting Directive (CSRD), which requires companies to report on their sustainability impacts, including human rights, using the detailed European Sustainability Reporting Standards.[18] Together, these directives mandate companies not only to identify and mitigate human rights risks but also to transparently report on their efforts and outcomes.

This EU framework has driven enhanced investor scrutiny. Investors now increasingly view poor human rights performance as a material financial risk. They are therefore demanding granular data on how companies are managing human rights in their supply and value chains.

The CSDDD and CSRD were intended to set a clear, consistent and high bar for corporate responsibility globally. However, their implementation has been thrown into a state of significant uncertainty. Intense political pressure from some EU member states and corporate lobbies, citing economic headwinds and regulatory burden, has led the European Commission to propose a 'simplification' of these new rules via the 'Omnibus package'.[19]

The Omnibus package, published by the European Commission in February 2025, aims to streamline and simplify the CSDDD and the CSRD in the name of cutting bureaucracy and promoting productivity. Subsequently in February, the European Council suggested that the threshold for companies in scope should be raised to €1.5 billion.[20] Civil society, human rights advocates and sustainable investors have raised alarms that 'simplification' is a euphemism for 'dismantling'.[21] They have warned that proposals to delay implementation, raise company size thresholds or weaken requirements for reporting on supply chains reduce the effectiveness of the directives and create uncertainty for business.

In December 2025, the European Council and Parliament's negotiators reached an agreement to simplify sustainability reporting and due diligence requirements with a view to boosting EU competitiveness. The agreement simplified the directives on corporate sustainability reporting and due diligence, reducing the reporting burden and limiting the obligations on smaller companies. It raised the CSRD reporting threshold to companies with €450 million turnover and the reporting timeline for non-EU companies has been pushed back to 2029. The threshold for CSDDD is €1.5 billion and EU-wide civil liability has been removed.

For responsible investors, the point remains that good human-rights-related disclosures are needed to understand businesses' relative performance in this area. We believe proportionate reporting requirements create a level playing field and consistent understanding between business and investors.

For business and human rights specialists, it is tempting to focus on legislative changes in Europe alone. However, there have been many positive developments across the world.

The US Uyghur Forced Labor Prevention Act was passed with bipartisan support by the Biden administration in 2021. Between January and October 2025, US Customs and Border Protection stopped 10,478 shipments of products valued at $890 million under this Act.[22] As of October 2025, there were 53 active withhold and release orders under the Tariff Act 1930 on goods in categories as diverse as agriculture and prepared products; apparel; automotive and aerospace; base metals; consumer products; electronics; industrial and manufacturing materials; machinery; and pharmaceuticals, health and chemicals.[23]

The Uyghur Forced Labor Prevention Act continues to be supported by the Trump administration. J.D. Vance has spoken against 'foreign countries that use slave labor that undercuts the wages of American workers'.[24] The Trump administration has also removed the de minimis exemption rule, which allowed shipments valued at less than $800 million into the country duty free and with little scrutiny.[25] This means that Chinese e-commerce companies such as Shein and Temu, which have faced accusations of being linked to forced labour,[26] now face tariffs, significantly hampering their low-cost business model.

Beyond Europe and the United States, countries in the Asia-Pacific are also beginning to address modern slavery risks. Though these countries have some of the largest prevalences of modern slavery globally,[27] they have historically had weak governmental policy aimed at tackling it. Countries such as Indonesia, Japan, South Korea and Thailand are beginning to address this issue – for example, Thailand has drafted the Act on the Promotion of Business Conduct 2025[28] which includes mandatory human rights and environmental due diligence provisions and Japan introduced a voluntary 'Respecting Human Rights in Responsible Supply Chains' framework in 2022.[29] Furthermore, Australia has recently announced a significant upgrade to its Modern Slavery Act 2018, with the possible introduction of mandatory human rights due diligence.[30]

Despite recent uncertainty and back-pedalling on mandatory human rights due diligence in Europe, from a broader, long-term perspective the direction of travel is still clear. Governments, investors and civil society stakeholders are expecting more from large businesses. They expect companies to undertake human rights due diligence, including meaningful engagement with stakeholders on the ground, identifying actual and potential harms, and enabling remedy when harms occur. These expectations encompass modern slavery and forced labour but are much broader.

Regulations shaping the human rights landscape

Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023

Section 307 of the US Tariff Act (1930)
US Uyghur Forced Labor Prevention Act 2021

European Union Corporate Sustainability Due Diligence Directive 2024

French Corporate Duty of Vigilance Law 2017

German Act on Corporate Due Diligence Obligations in Supply Chains 2023

Netherlands HREDD Law 2021

Norwegian Transparency Act 2022

Swiss Ordinance on Due Diligence and Transparency 2021

UK Modern Slavery Act 2015

Australian Modern Slavery Act 2018

New South Wales Modern Slavery Act 2018

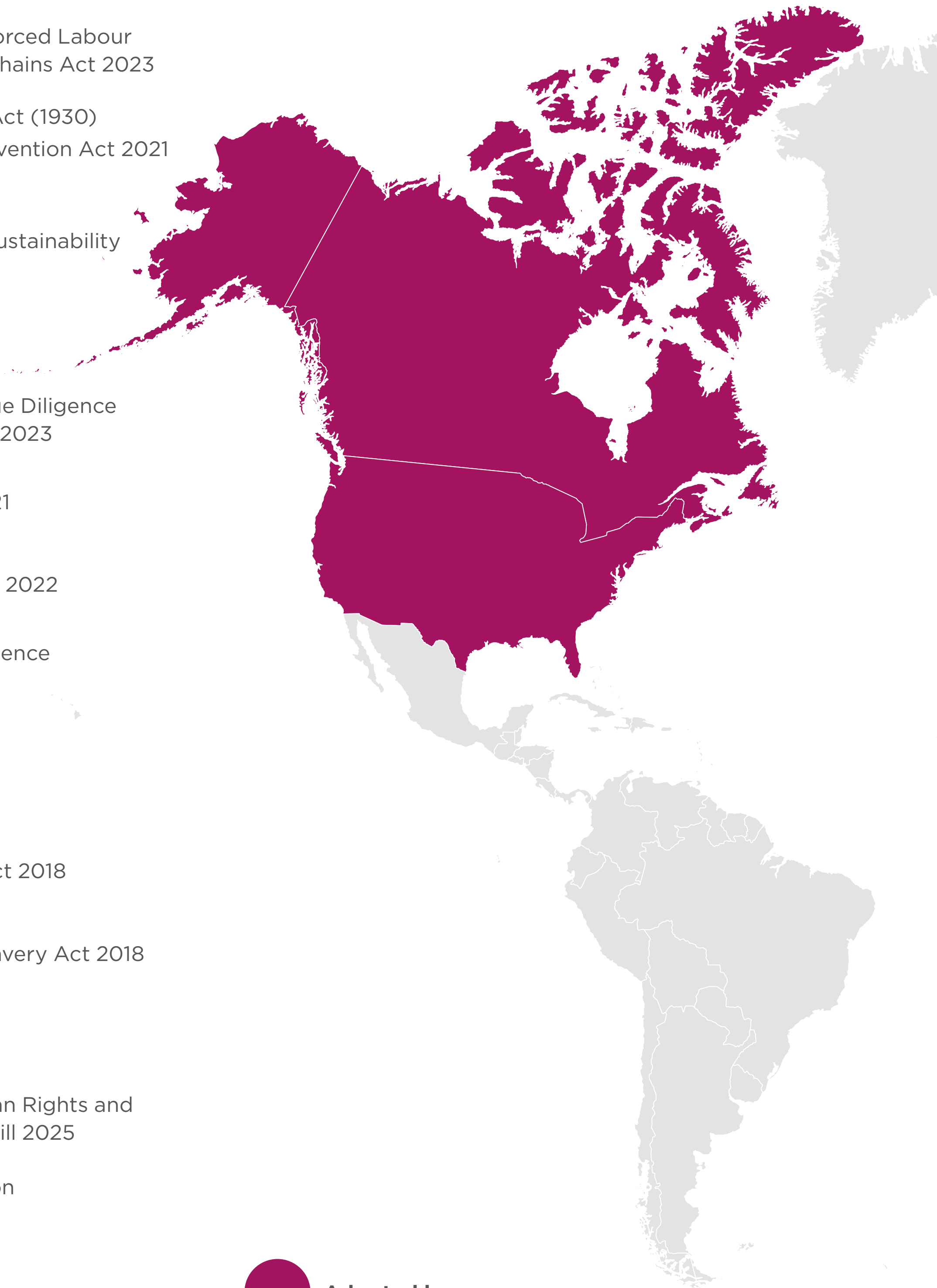
New Zealand's Plan of Action

South Korea Corporate Human Rights and Environment Due Diligence Bill 2025

Thailand Act on the Promotion of Business Conduct 2025

UN

Soft Law
The UN Guiding Principles on Business and Human Rights apply globally and Organisation for Economic Co-operation and Development (OECD) guidelines apply for multinational enterprises from the OECD member countries.



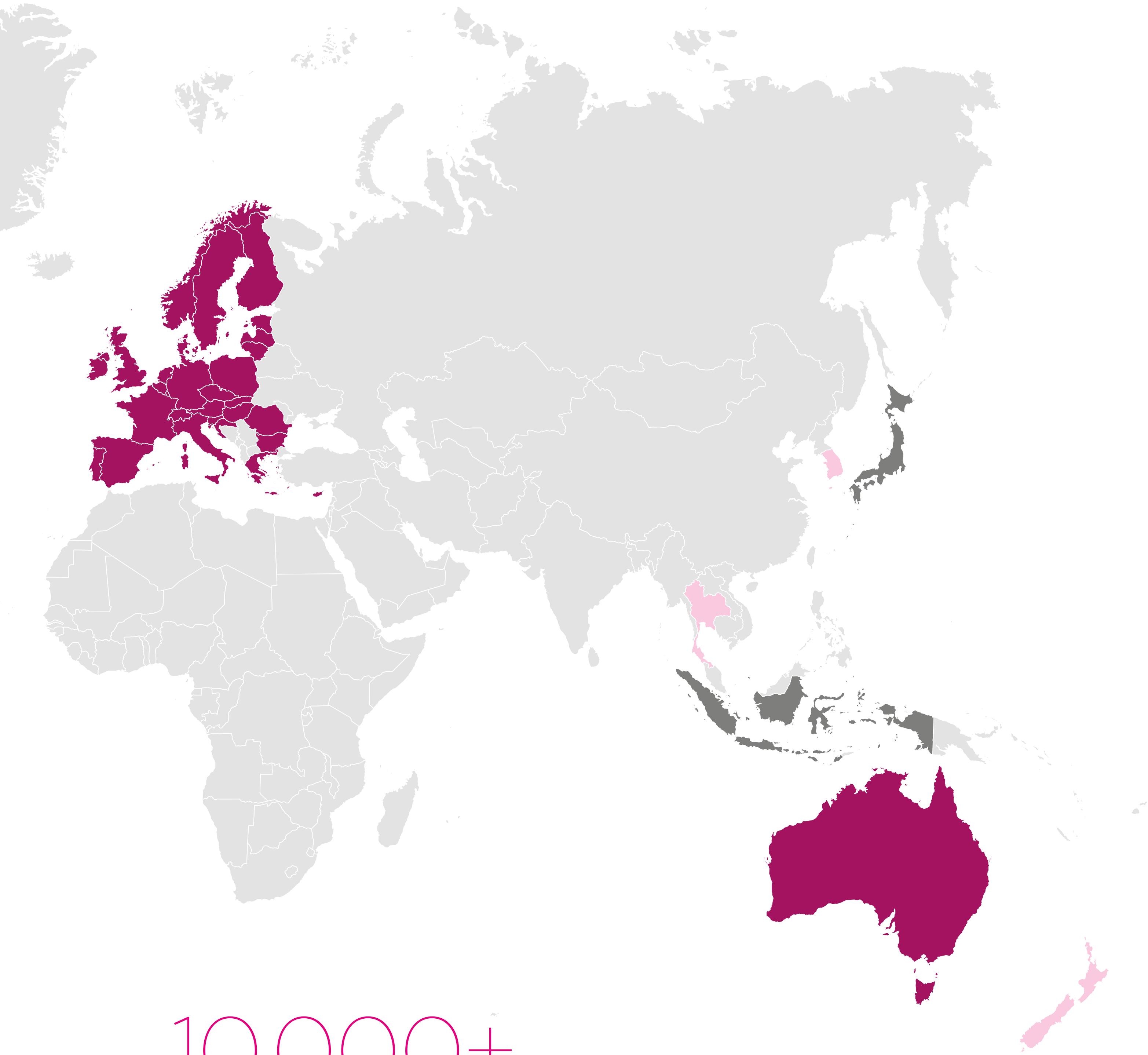
Adopted law

Political process

Policy statements & public discussions

$236 billion

is generated every year in illegal profits from forced labour



10,000+

shipments of products stopped under the Uyghur Forced Labor Prevention Act

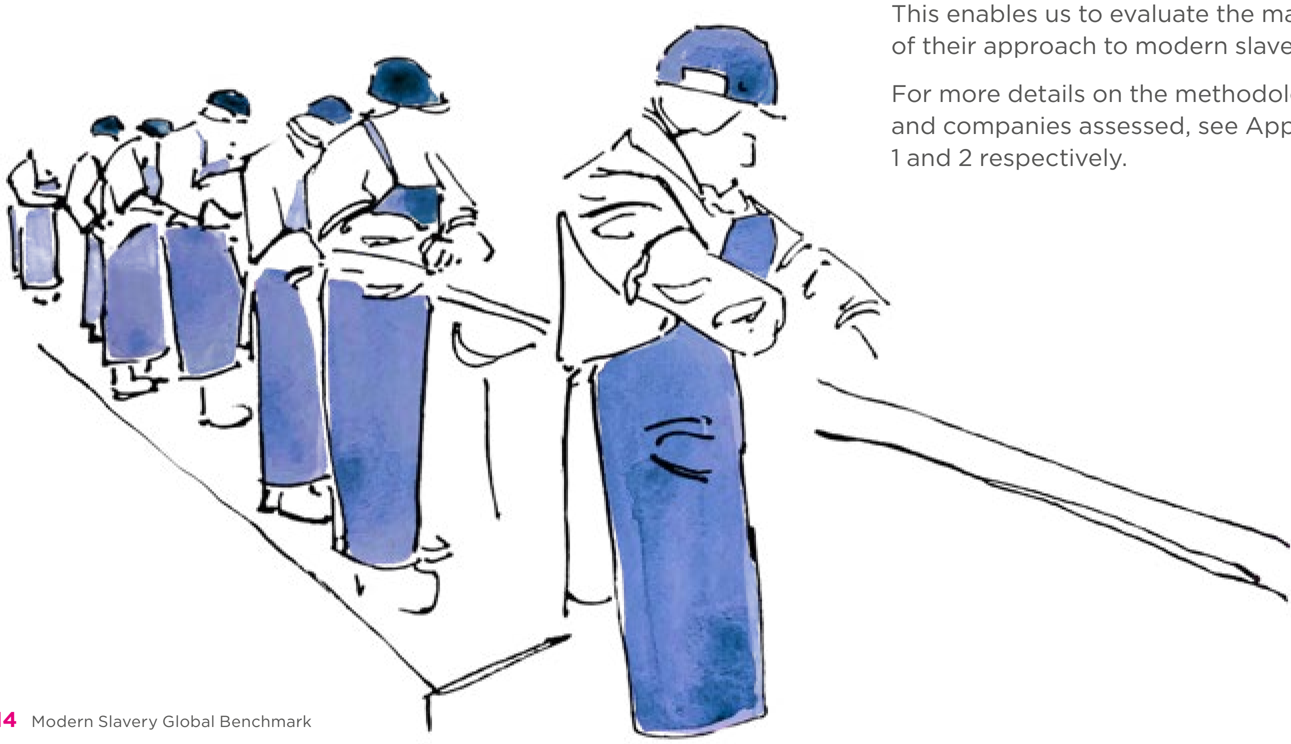
Company ranking

The CCLA Modern Slavery Global Benchmark assessed 111 global companies. The companies were selected based on their market capitalisation, previous inclusion in the pilot benchmark and whether they are in the scope of the UK Modern Slavery Act 2015. UK companies in the global top 100 were assessed in the CCLA Modern Slavery UK Benchmark 2025.

The companies represent nine industry sectors, which are classified using the Global Industry Classification Standard as communication services, consumer discretionary, consumer staples, energy, financials, health care, industrials, information technology and materials.

Framework

The company assessments and quality assurance took place in August and September 2025 based on information that was publicly available as of 15 August 2025. The large volumes of company disclosures were analysed using a hybrid approach employing a large language model combined with human quality assurance. All companies were invited to review their preliminary assessments in September before the scores were finalised in October.



The benchmark assesses companies against 48 assessment criteria and has a total of 62 points. This framework was developed from CCLA's Find it, Fix it, Prevent it initiative, which was created to guide investors' engagements with companies.[31] It is based on the UN Guiding Principles on Business and Human Rights and draws on existing best practice developed by the Business and Human Rights Resource Centre, the UK Ethical Trading Initiative and KnowTheChain (see page 88).

The criteria cover five sections:

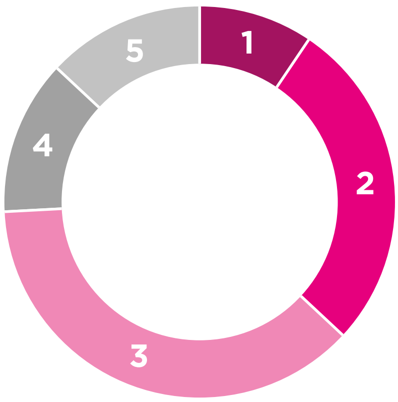
- UK Modern Slavery Act compliance and registry
- Conformance with UK Home Office guidance on modern slavery (2021)[32]
- Find it
- Fix it
- Prevent it.

Each section is weighted as illustrated on the page opposite (see Appendix 3 for the full benchmark assessment criteria). This weighting reflects our belief that 'finding' modern slavery is the hardest task but matters most.

The rankings are based on each company's overall score as a percentage of the maximum points available.

Companies are ranked across five performance tiers (set out opposite). This enables us to evaluate the maturity of their approach to modern slavery.

For more details on the methodology and companies assessed, see Appendices 1 and 2 respectively.



1 Modern Slavery Act compliance and registry
10%

Derived from the UK Modern Slavery Act 2015. This section also takes account of whether the company's statement has been uploaded to the UK government's Modern Slavery Statement Registry.

2 Conformance with Home Office Guidance
27%

Derived from the Home Office's guidance on transparency in supply chains, updated in 2021. The section reflects what the UK government believes a good modern slavery statement should contain.

3 Find it
37%

Covers corporate business and human rights due diligence processes and efforts to find, assess and measure the risks of modern slavery in supply chains. This section also examines whether companies have disclosed modern slavery.

4 Fix it
13%

Covers companies' efforts to provide remediation to victims of modern slavery.

5 Prevent it
13%

Covers companies' efforts to prevent the occurrence of modern slavery in their operations and supply chains. This section examines areas including governance, purchasing and recruitment practices, and resources for implementation.

PERFORMANCE TIERS

Performance tier	Percentage score	Tier description
1 **Leading on human rights innovation**	81–100	An evolved and mature approach to human rights due diligence. There are extensive discussions of the risks of modern slavery, case studies on systemic modern slavery risks in the sector, and discussions of meaningful activities to find, fix and prevent modern slavery.
2 **Evolving good practice**	61–80	Evidence can be seen of human rights due diligence practices on modern slavery informed by experts and/or civil society partners. There is evidence of activity in the Find it, Fix it and Prevent it categories.
3 **Meeting basic expectations**	41–60	The company meets and exceeds minimum expectations – for instance, by undertaking risk assessments for its business and supply chains, communicating regularly with suppliers on modern slavery risks, providing relevant training to staff, and monitoring efficacy. There is also evidence of whistleblowing mechanisms. However, the due diligence processes could be improved to ensure they are fully capturing the risks to the business and rights holders.
4 **Developing approach**	21–40	The company has relevant policies, but there is little evidence of sufficient human rights due diligence. For instance, risk assessment processes are primarily desk-based and focused on compliance.
5 **Unsatisfactory**	0–20	The company has a limited modern slavery approach. It may not have an in-date modern slavery statement.

Benchmark results

1 Leading on human rights innovation

5 companies

- BHP Group
- Cisco Systems
- Microsoft
- Nestlé
- Samsung Electronics

2 Evolving good practice

17 companies

- Advanced Micro Devices
- Alphabet
- Amazon
- Apple
- Coca-Cola Co
- Commonwealth Bank of Australia
- Costco Wholesale
- Inditex
- International Business Machines
- L'Oréal
- Merck & Co
- Novartis
- PepsiCo
- Philip Morris International
- Schneider Electric
- Sony Group
- Tesla

3 Meeting basic expectations

41 companies

- Accenture
- Adobe
- Airbus
- AT&T
- Bank of America
- Booking Holdings
- Broadcom
- Comcast
- ConocoPhillips
- Deutsche Telekom
- Eaton Corporation
- GE Aerospace
- Gilead Sciences
- Goldman Sachs Group
- Hermès International
- Honeywell International
- Intuit
- Johnson & Johnson
- Mastercard
- McDonald's
- Meta Platforms
- Morgan Stanley
- Novo Nordisk
- NVIDIA
- Oracle
- Pfizer
- Qualcomm
- Roche Holding
- S&P Global
- Salesforce
- SAP
- Siemens
- Stryker
- Texas Instruments
- Thermo Fisher Scientific
- TJX Companies
- TotalEnergies
- Toyota Motor
- Verizon Communications
- Vertex Pharmaceuticals
- Walt Disney Co

4 Developing approach

40 companies

- Abbott Laboratories
- AbbVie
- Agricultural Bank of China
- Allianz Group
- American Express Co
- Amgen
- ASML Holding*
- Bank of China
- BlackRock
- Blackstone Group
- Boston Scientific
- Caterpillar
- Chevron
- China Construction Bank
- China Merchants Bank
- Contemporary Amperex Technology Co*
- Danaher
- Eli Lilly and Co
- Exxon Mobil
- Industrial and Commercial Bank of China
- Intuitive Surgical
- JPMorgan Chase & Co
- KKR & Co
- Linde
- Lockheed Martin
- LVMH Moet Hennessy Louis Vuitton*
- Mitsubishi UFJ Financial Group*
- Netflix
- Palantir Technologies
- PDD Holdings
- Procter & Gamble
- Royal Bank of Canada
- Sanofi
- ServiceNow
- Tata Consultancy Services
- TSMC*
- Uber Technologies
- UnitedHealth Group
- Visa
- Wells Fargo & Co

5 Unsatisfactory

8 companies

- Alibaba Group Holding*
- Charles Schwab*
- HDFC Bank*
- PetroChina Co*
- Reliance Industries*
- RTX*
- Saudi Aramco*
- Tencent Holdings*

Key:

- Engaged with benchmarking process
- Communication services
- Consumer discretionary
- Consumer staples
- Energy
- Financials
- Health care
- Industrials
- Information technology
- Materials

*Companies that had not published a UK modern slavery statement in the past 15 months that covered all their UK operations.

Performance analysis

Tier distribution

The chart below shows the numbers of companies in each performance tier.

Average scores

The average score across all the benchmarked companies was 45%. This ranks the average benchmarked company towards the lower end of tier 3 ('meeting basic expectations'). The average score suggests that although global companies are beginning to undertake human rights due diligence, their activities remain desk-based and do not sufficiently capture the risks to affected workers.

There is some disparity between the global average of 45% and the first UK benchmark average (in 2023) of 55%. The UK benchmark average has improved by 5 percentage points over the past three years, and we hope this trajectory will be reflected among the global companies.

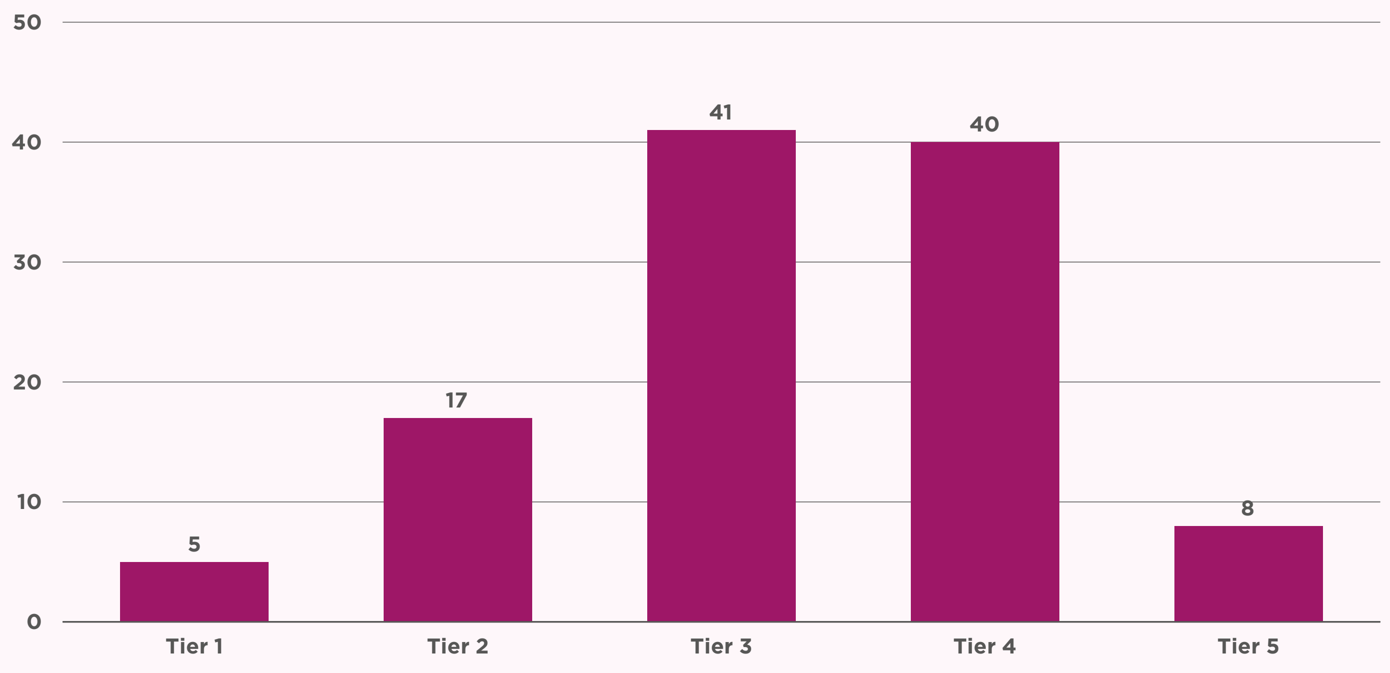
There is also a significant disparity between the highest- and lowest-scoring companies in the benchmark. The top-scoring company achieved 85% while the lowest achieved just 2%. This vast range indicates that although some companies are dedicating significant resources to tackling modern slavery, others are barely addressing the issue.

Comparison with the pilot

This report will not draw systematic comparisons between the findings of the CCLA Modern Slavery Global Benchmark pilot project, launched in May 2025, and this dataset.

Several factors informed this decision. Firstly, the pilot was designed as a landscape review, primarily based on disclosures from 2023. We did not publish detailed analytical findings, which limits our ability to make interesting comparisons and point to trends.

PERFORMANCE TIER DISTRIBUTION



Additionally, since the pilot, there have been notable methodological enhancements. These include improvements in the large language model technology used to conduct the initial company assessments, refinement of specific data points to align more closely with the 2025 UK benchmark, and an expansion in the volume of corporate disclosures reviewed.

However, in undertaking both projects, we noticed some qualitative changes in company reporting that we wish to highlight.

1 More granularity

Companies are disclosing where modern slavery risks are located in their supply chains with greater granularity. Previous reporting may have consisted of recognising 'at-risk groups' rather than reporting areas of high risk within a company's own operations and supply chain. This is a crucial first step in a modern slavery risk assessment centred on workers.

2 Expanded human rights reporting

It is encouraging to see some companies continue to expand their human rights reporting:

- AT&T has improved its disclosure surrounding its risk assessments for its direct operations, how it manages modern slavery risk through staff training, and how it has engaged directly with workers to inform its modern slavery risk assessments.
- Microsoft has provided more granular detail on its supply chain and disclosed how it incorporates site-level analysis into its modern slavery risk assessments.
- China Merchants Bank has now published a modern slavery statement, whereas it had not in 2023.

3 Reduced transparency around whistleblowing

Seven companies have removed reporting on the number of whistleblowing reports flagged for concern. Given that the overall direction of movement on human rights reporting requirements is for business to increase its reporting on practices and outcomes, this pullback on transparency is concerning.

4 Halted commitments

Four companies – BlackRock, China Merchants Bank, ConocoPhillips and Siemens – have removed their commitment to the UN Guiding Principles on Business and Human Rights from their human rights policies and/or corporate disclosures.

“”

> We continually strive to respect and promote human rights throughout our value chain, encouraging others to do the same. We value investors who assess human rights due diligence practices, as this recognizes and supports businesses' efforts in this critical area. At Nestlé, we maintain a strict zero tolerance policy towards any form of modern slavery or human rights abuses. We collaborate closely with our partners and stakeholders to ensure that our practices align with international human rights standards and effectively address any risks that may negatively impact individuals and communities.

John Armstrong
Investor Relations, Nestlé [33]

Comparison with the 2025 UK benchmark

Drawing comparisons between the results of the first global benchmark and the 2025 CCLA Modern Slavery UK Benchmark can be useful for multiple reasons.

Firstly, the UK Modern Slavery Act 2015 introduced the first mandatory corporate reporting on modern slavery worldwide. Although many companies are subject to the Modern Slavery Act's requirements, the eligibility criteria for producing a modern slavery statement are not clear. As a result, most UK companies have been reporting for longer than their global counterparts. UK companies can provide a helpful benchmark for global companies, as many have similarly vast supply chains with the additional benefits of more entrenched human rights due diligence reporting systems.

Secondly, comparing those companies that mostly conform to UK legislation with those companies that report in line with all kinds of global legislation can identify regulatory gaps. The disparity we see between the UK and global benchmarks demonstrates that there is a need for more cohesive global human rights legislation.

Thirdly, the CCLA Modern Slavery UK Benchmark has been conducted three times. It is useful to highlight year-on-year trends among UK companies to show global companies where improvements are possible – and to hypothesise about future progress.

The remaining sections of this report therefore draw comparisons to the UK data where relevant.

Section analysis

Overview

The best-performing sections of the benchmark were ‘UK Modern Slavery Act compliance and registry’ (average score of 63%) and ‘Conformance with UK Home Office guidance on modern slavery’ (62%). Given the fairly low bar to comply with the UK Modern Slavery Act 2015 and meet minimum expectations for what to include in a modern slavery statement, this is unsurprising. However, it should be noted that there are significant gaps between the average scores for these sections for global and UK companies. This is discussed in further detail on page 22. It suggests that there is considerable work to be done to clarify the global scope of the Modern Slavery Act.

The fairly low average score for ‘Find it’ (38%) is driven by a lack of disclosure surrounding corporate supply chains. Companies are often able to disclose their desk-based risk assessment process and their participation in multi-stakeholder or industry initiatives dedicated to tackling modern slavery. However, they struggle to disclose key information about the workers in their supply chain or show how they are engaging these stakeholders in their risk assessments.

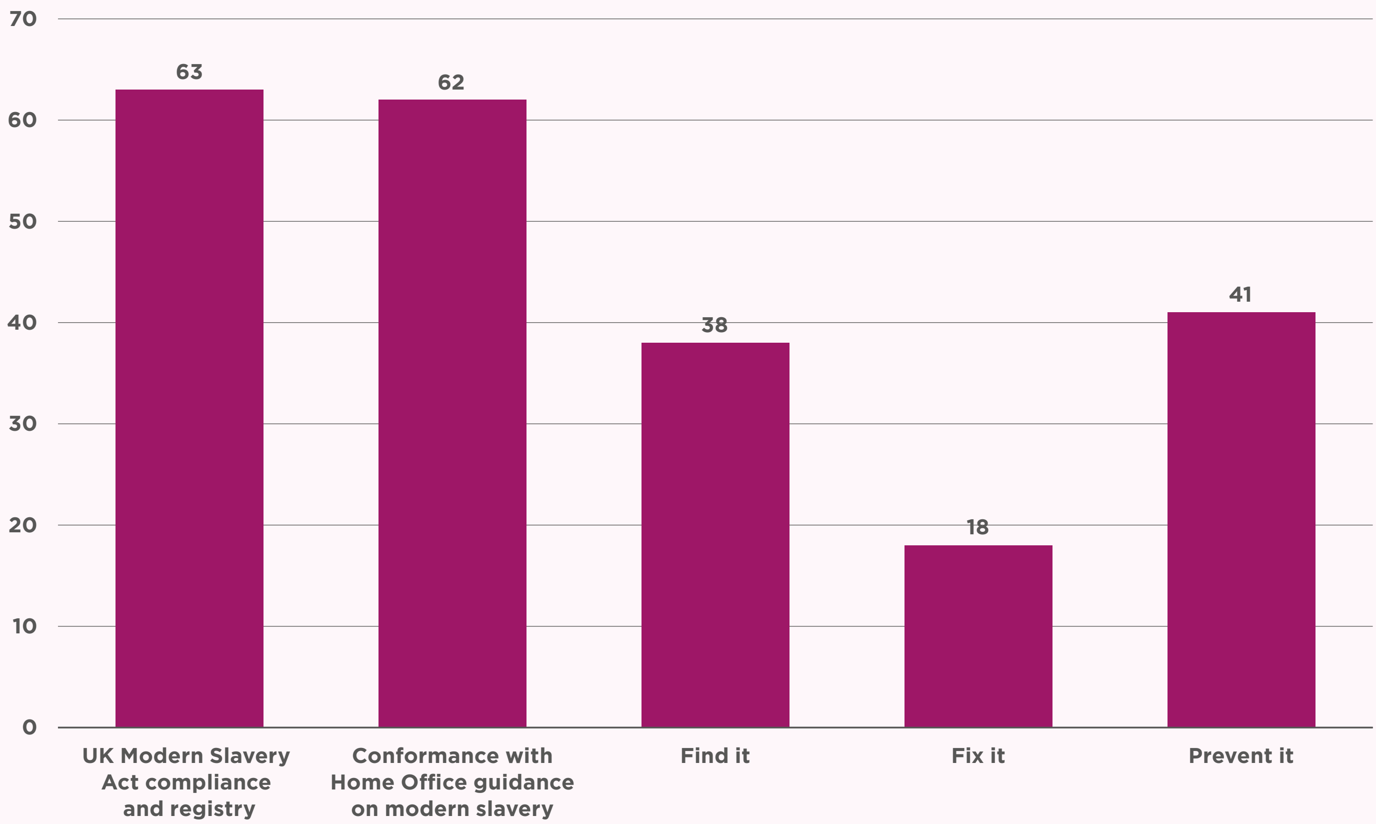
As is the pattern across all CCLA Modern Slavery UK Benchmarks, the lowest-performing section was ‘Fix it’, with an average score of 18%. In ‘Fix it’, points are primarily awarded for disclosing actions taken to remedy cases of modern slavery. Indeed, to gain most of the points in this section, a company needs to disclose a case of modern slavery that it has found in its operations, supply chain or value chain.

It was therefore encouraging to see 27 companies disclose finding a case of modern slavery. Reporting cases of modern slavery is valuable for investors and other stakeholders as it demonstrates a company's commitment to transparency, accountability and remedy. CCLA believes that, given the scale of forced labour in the private economy and the interdependencies of global supply chains, all large, listed companies should be able to find modern slavery in their business activities. We hope to see more companies disclose cases next year.

The final section, 'Prevent it', covers systems relating to modern slavery governance, purchasing and recruitment. Its average score of 41% fits with the trend seen across the benchmark: there remains a focus on policy rather than practical activity to tackle modern slavery. The lowest-scoring sections in the benchmark – 'Find it' and 'Fix it' – emphasise company action, rather than commitments and disclosure. For more information on the benchmark criteria, see Appendix 3.

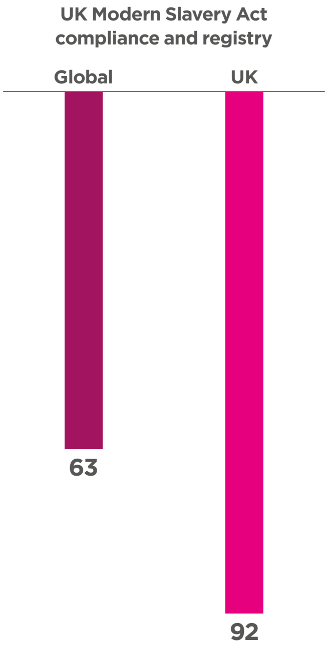
The chart below shows the average scores for each section of the benchmark.

MEAN PERCENTAGE SCORE BY SECTION



Section 1: UK Modern Slavery Act compliance and registry

This section of the CCLA Modern Slavery Global Benchmark is mostly derived from the statutory requirements of the UK Modern Slavery Act 2015.



There are five statutory requirements covered:

- publishing a modern slavery statement annually
- having a clearly labelled link to the statement on the company homepage
- having the board approve the statement
- having a director sign the statement
- providing an explanation of the steps the company has or has not taken to combat modern slavery.

Additionally, this section addresses whether companies have uploaded their statement to the UK Modern Slavery Statement Registry (question 2). Although this is not a statutory requirement, the guidance strongly encourages companies to do so. This was the lowest-scoring question in this section, with only 29% of the companies receiving the point available.

Given that this section pertains to UK regulation, it is perhaps unsurprising that it was low-performing in comparison to the 2025 UK benchmark. While 100% of UK companies had published a modern slavery statement in the 15 months preceding their assessment date, this number falls to 88% for global companies (question 6).

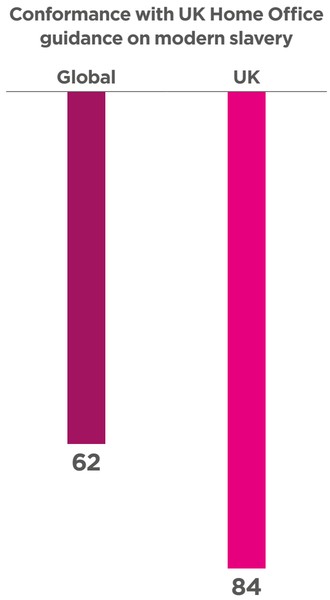
This could in part reflect a lack of clarity around which companies are required to report. Section 54 of the Modern Slavery Act indicates that companies are within its scope if they supply goods or services, have a total turnover of £36 million a year, and 'carry on a business, or part of a business, in the UK'. New guidance from the UK Home Office has clarified that this should be determined by a 'common-sense approach'.[34] For more information about how we determined company scope, see Appendix 1.

$611 billion

could be generated in additional GDP by bringing people into formal employment

Section 2: Conformance with UK Home Office guidance on modern slavery

This section is derived from UK Home Office guidance, first published in 2015.[35] This statutory guidance indicated what the UK government believed a good modern slavery statement should contain.



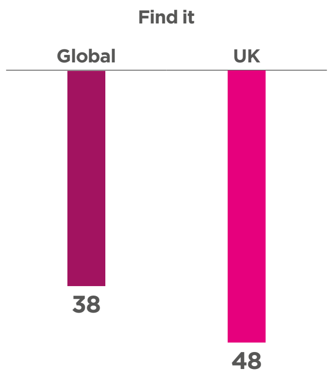
As noted above, new guidance was published in March 2025 and will be incorporated into our 2026 benchmarking cycle.

This year's results demonstrate that corporate reporting still favours policy over practice. While it is encouraging to see 88% of the companies providing information about their policies in relation to modern slavery (question 10), far fewer (32%) publicly set targets on their modern slavery approach and reported against them (question 19).

Furthermore, global companies are still reluctant to disclose where modern slavery risks are located in their businesses. Only half of the assessed companies identified where risks could be found in their supply chain (question 14) and only 40% identified the risks associated with their direct operations (question 13). This is a crucial first step in a human rights risk assessment and should inform how all further due diligence is prioritised. In comparison, 87% of UK companies scored the point available for question 14, and 71% scored the point for question 13. See pages 50–52 for examples of good practice in relation to these questions.

Section 3: Finding modern slavery

The 'Find it' section covers a company's human rights due diligence processes and the degree to which they are designed to find modern slavery.



To be active in the fight against modern slavery, companies need to be able to identify their areas of highest risk and increase the visibility of their employment practices in these areas. Companies that have not found modern slavery may not be looking hard enough, which could be a failure in due diligence.

As is consistent with our findings in section 2, companies generally scored well on questions in this section addressing their policies and procedures. An encouraging 93% had a grievance mechanism that was open to direct employees and workers in their supply chain (question 34), making this the highest-scoring question in the benchmark. However, only 24% of the companies disclosed the number of whistleblowing reports flagged for concern (question 35), which was considerably lower than the 86% of UK companies that disclosed this information. Disclosing the number of reports made demonstrates to investors and other stakeholders that the mechanism is fit for purpose.

There was, in general, a lack of disclosure about companies' supply chains. Only 29% of global companies disclosed a partial list of their tier-one supplier locations, and only 5% disclosed a list of supplier addresses (question 22). Companies in the UK benchmark found disclosing lists of supplier addresses equally challenging, with only 5% scoring, although 54% scored for disclosing a partial list. This demonstrates that there is significant crossover in the disclosures of leading companies in the UK and global benchmarks, but also that many global companies should begin to take steps to provide basic supply chain transparency. The lack of disclosure is unsurprising, given the rigorous compliance processes that corporate disclosures must adhere to. Nevertheless, it leaves investors blind to the risks inherent in their portfolios' supply chains.

There were similar levels of transparency between companies' reports on their tier-one suppliers and companies' reports on suppliers further down the supply chain. As stated above, 29% disclosed a partial list of tier-one supplier locations, and 25% disclosed a partial list of companies beyond tier one (question 23). This deviates from the pattern in the UK benchmark, where companies generally limit the disclosure of their supplier lists to tier one.

Many companies in the global benchmark are subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act 2010. This legislation requires US-listed companies to report to the Securities and Exchange Commission on their use of conflict minerals (gold, tantalum, tin, and tungsten).[36] Many of these 'conflict minerals reports' go into detail on the company's raw materials supply chain and how it is conducting further mapping exercises.

It is no surprise that 38% of the assessed companies demonstrated how they are mapping their supply chain (question 21), showing the positive impact of US mandatory supply chain reporting.

It is encouraging to see that 84% of the companies have some form of basic human rights risk assessment (question 24). However, only 25% disclosed risk assessments centred around the risks to workers (question 29). In the future, we would like to see more companies incorporate this saliency lens, aligning with the Corporate Sustainability Due Diligence Directive and Corporate Sustainability Reporting Directive legislation (see page 10), and to further incorporate site-level analysis into their risk assessments.

Finally, 27 companies (24%) disclosed a case of modern slavery (question 36). These disclosures were largely concentrated in the consumer discretionary, consumer staples and information technology sectors, where modern slavery risks are more systemic. Reporting cases of modern slavery is valuable for investors and other stakeholders as it demonstrates a company's commitment to transparency, accountability and remedy.

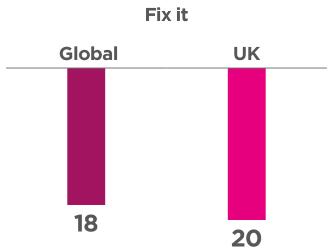
Companies must score on question 36 to score on questions 38–42 in the 'Fix it' section.

Risk assessments

should go beyond desk-based assessments to include engagement with people at risk of modern slavery

Section 4: Fixing modern slavery

The ‘Fix it’ section focuses on the need to provide or enable remediation when human rights and modern slavery cases are identified. CCLA believes that all assessed companies have the capacity to find modern slavery in their supply chain. Therefore, to score 88% of the available points in this section, companies must have disclosed finding a case of modern slavery.



Although this section is the lowest scoring in the benchmark, with an 18% average score, this is comparable to the UK benchmark’s 20% average. This demonstrates that there are common challenges faced by all companies in reporting and evidencing their most impactful actions in relation to modern slavery.

The disparity between policy and action seen across the benchmark is evident here. A notable 74% of the companies had a human rights policy that referenced or aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) (question 37), but only 20% reported initial steps they had taken to address cases of forced labour in their business (question 39). Without a comprehensive remediation process focused on mitigating harms to those affected by forced labour, companies are not fulfilling their obligations under the UNGPs.

Furthermore, evidence of a focus on survivors of forced labour was even more sparse: 11% of the companies reported the outcome of a remedy process for those affected (question 40) and only 3% disclosed that survivors were satisfied with the remedy provided to them (question 41). Moreover, where the outcomes of remedy were disclosed, we observed a heavy focus on the return of assets – such as the repayment of recruitment fees in tech supply chains – rather than comprehensive compensation and support.

EXPLANATION
REMEDY TO VICTIMS

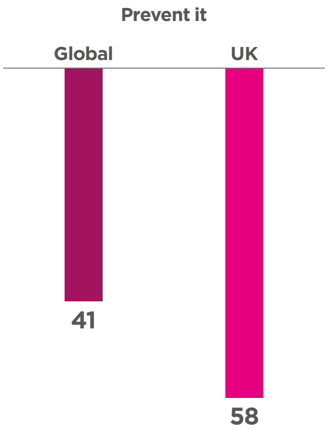
Question 41

Did the company provide evidence that remedy was satisfactory to the victims or groups representing the victims?

Question 41 is based on a clear expectation in the UN Guiding Principles on Business and Human Rights (UNGPs), which outline expectations for businesses and state actors on providing access to remediation.

The UNGPs stress that ‘for an operational-level grievance mechanism, engaging with affected stakeholder groups about its design and performance can help to ensure that it meets their needs, that they will use it in practice, and that there is a shared interest in ensuring its success. Since a business enterprise cannot, with legitimacy, both be the subject of complaints and unilaterally determine their outcome, these mechanisms should focus on reaching agreed solutions through dialogue. Where adjudication is needed, this should be provided by a legitimate, independent third-party mechanism.’[37]

For an example of good practice on question 41, refer to Appendix 3.



Section 5: Preventing modern slavery

Companies can take a variety of preventative actions without having identified cases of modern slavery. ‘Prevent it’ focuses on the leadership and resources needed to tackle modern slavery, ensuring the company has responsible procurement practices, and endorsement of key policy stances such as the Employer Pays Principle.

The global average score for ‘Prevent it’ is 41%, which is significantly lower than the UK average of 58%. In particular, we observed a disparity in global company commitments to the Employer Pays Principle (question 45). Given the prevalence of migrant labour in global supply chains, even a policy commitment to banning recruitment fees and taking full responsibility for the cost of recruitment is an important first step in reducing modern slavery risks.

Companies did, however, demonstrate strong commitments to treating their suppliers fairly: 77% incorporated this commitment into their disclosures (question 46), although there was a lack of evidence on how such policies are enacted. In contrast, only 12% of companies disclosed how they would leave a supplier relationship in a responsible way that prioritised worker welfare (question 44). This would suggest either that disclosures are less mature or that policy commitments to treating suppliers fairly are not incorporated into wider company human rights considerations.

Global companies are showing a good start on policy development. However, companies should support their commitments to fair supplier relationships with further preventative measures that protect against the imposition of recruitment fees and prioritise worker welfare in ending supplier partnerships.

EXPLANATION
RESPONSIBLE EXIT

Question 44
Did the company discuss a responsible exit strategy from a supplier relationship?

Companies have a variety of options when a case of modern slavery or a broader adverse human rights impact is found within a supplier. Option one is to exit at the first opportunity, but this is likely to be detrimental to vulnerable workers. Therefore, companies will often try to remediate the situation by working in collaboration with the supplier, only choosing to sever the relationship if the supplier is unresponsive or tries to obstruct the process. We believe this option is best.

To score the point available for this question, companies must recognise that working to remedy a situation is in the best of interests of individuals, rather than simply easier from a business continuity perspective. They must show how they would leave in a way that would minimise harm to the affected workforce.

SPOTLIGHT ON RECRUITMENT FEES

Transparentem's report 'Material risk, minimal response' highlights an issue also identified in both CCLA Modern Slavery Benchmarks: not enough companies are addressing the risk of worker-paid recruitment fees. The report focuses on the prominent high-risk sector of Malaysian electronics. However, this is a challenge faced by migrant workers globally, who may be recruited through deceptive hiring practices and trapped by debt bondage.

Both this benchmark and Transparentem's report reveal concerns about policy and practice in this area. Few companies have comprehensive policies on the ethical recruitment of migrants that include prohibiting and repaying recruitment fees, preventing document retention, and providing contracts that migrant workers can understand. In practice, too, both this benchmark and Transparentem's report find that few companies can demonstrate thorough audit protocols that ensure integrity. Particularly when 'audit deception is pervasive', a reliance on social audits lacking measures to uphold credibility can work to 'conceal problems rather than reveal them'.[38]

Transparentem's report resonates with the message of this benchmark and the call to investors to confront and pressure their portfolio companies to do better: 'Unethical labor recruitment must not be treated as a peripheral social issue, but as a core compliance concern and material risk.'[39]

> Cisco's commitment to eradicating forced labor is grounded in our core values and reflects our dedication to dignity and respect for every worker in our supply chain. By embedding human rights indicators into our commercial decisions, we ensure that ethical practices are fundamental to our success and responsible growth.

Chuck Graham
Chief Supply Chain Officer, Cisco Systems[40]

Sector analysis

The companies represent nine industry sectors, which are classified using the Global Industry Classification Standard (GICS) as communication services, consumer discretionary, consumer staples, energy, financials, health care, industrials, information technology and materials.

Key trends

1 The best-performing sectors are those most exposed to risk

Consumer staples was the highest-performing sector, with an average score of 69%. This is unsurprising given the sectors' exposure to risk, the number and frequency of media exposés over the years, and the maturity of its labour rights programmes. Indeed, almost all consumer staples companies disclosed a case of modern slavery in their operations, supply or value chains (question 36).

2 Energy and financials are the lowest-scoring sectors in the benchmark

The energy sector scored 27% and the financial sector scored 32% – both well under the benchmark's 45% average. These results are largely driven by poor performance on the questions in the framework relating to due diligence and remedy. None of the seven companies in the energy sector disclosed finding modern slavery. This contrasts with the findings of the UK benchmark, where energy companies tend to disclose systemic modern slavery risks and the remedy provided.

Financial companies score similarly low on the 'Find it' and 'Fix it' sections of the benchmark. Only one company disclosed information on how risk factors influence its due diligence process (question 24) and only one company disclosed its most salient modern slavery risks (question 29).

The benchmark credits companies for due diligence activities in their value chains as well as their supply chains, so further disclosure in this area could see the sector's score improve. We have seen this in the UK financial sector, where further disclosure surrounding company investments and property portfolios has resulted in significant improvement.

3 Information technology is the only sector in the global benchmark that performed better than its UK counterpart

The good performance of information technology in the global benchmark contrasts with its performance in the 2025 UK benchmark, where it was the poorest performing sector. This is perhaps unsurprising given that the benchmark shows that companies in higher-risk sectors tend to have more developed due diligence systems, and score higher. UK companies tend to be predominantly software-based, whereas half of the global information technology sector is concentrated on technology hardware and semiconductors, where the risks are higher.*

There are well-documented risks in technology supply chains, including labour exploitation in mineral extraction and debt bondage in product manufacture.[41] Therefore, despite the sector scoring 55% (above the benchmark average of 45%), there is still room for improvement.

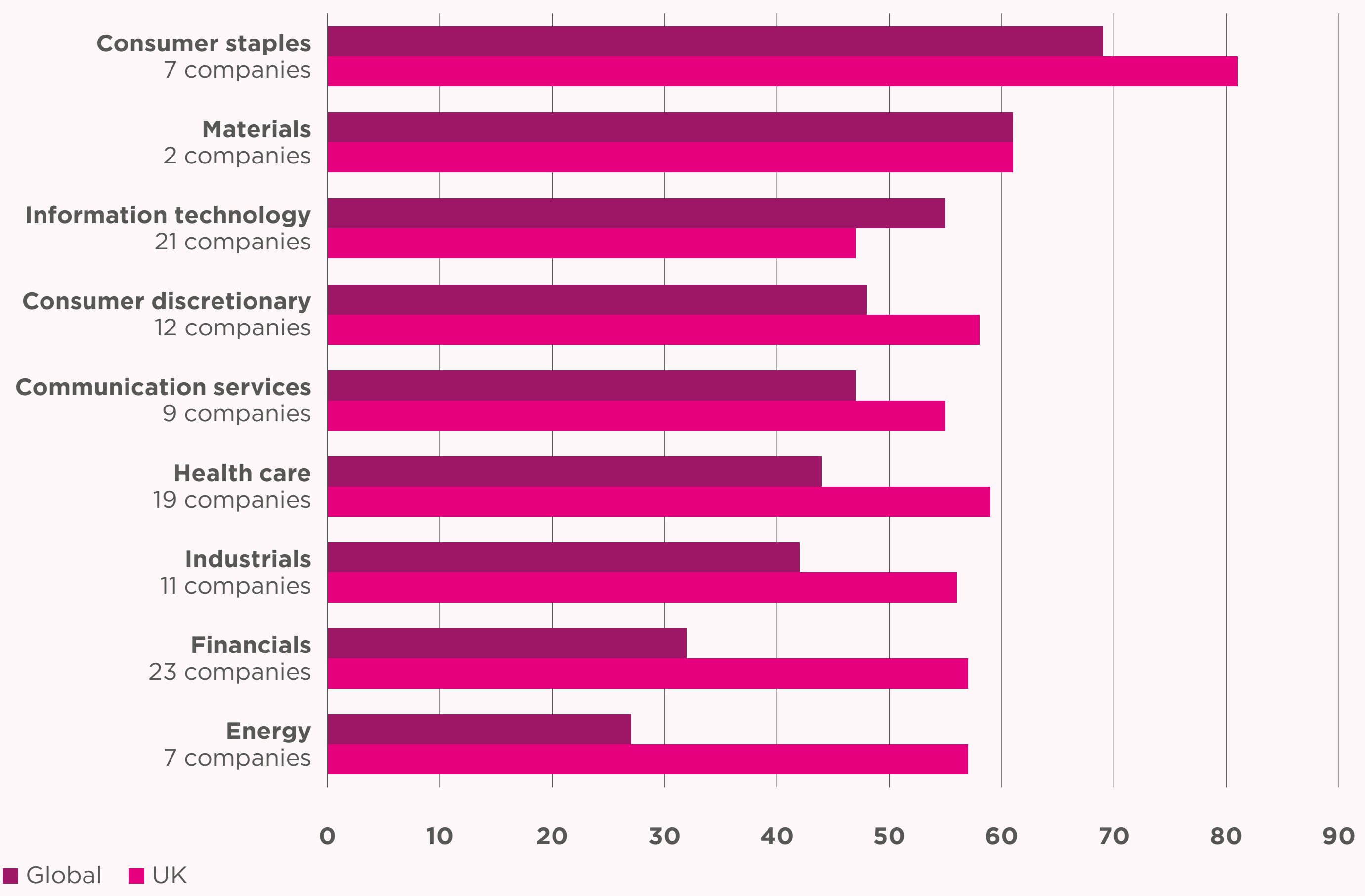
*As defined by the GICS industry classification: semiconductors and semiconductor equipment; software and services; and technology hardware and equipment.

Generally, these companies rely on their membership of the Responsible Business Alliance (RBA) for a sizeable portion of their approach to labour standards. The RBA is the world's largest industry coalition dedicated to responsible business conduct in global supply chains. It has well-developed programmes for tackling forced labour in both the product manufacturing and the raw materials and minerals parts of the supply chain.

Although companies' work with the RBA has, in many cases, been reflected in the scoring, it is important to acknowledge some criticisms of initiatives of this kind. KnowTheChain, a civil-society-led human rights benchmark, calls out how an 'over-reliance of companies on industry initiatives and trade associations in responding to [allegations made by KnowTheChain in 2025] highlights [an] alarming gap in companies' due diligence'.[42] Additionally, the RBA itself has been subject to public critique by labour rights groups calling for more transparency and accountability to workers' and rights groups.[43]

The chart below shows the nine sectors and their average percentage scores alongside the equivalent percentage scores for the UK benchmark. The number of companies in each sector is indicated next to the sector name to contextualise the high performance of some sectors with a low number of companies.

AVERAGE PERCENTAGE SCORE BY SECTOR



Geographical analysis

The companies in the benchmark are domiciled in 12 countries, covering three regions: Asia-Pacific, EMEA (Europe, the Middle East and Africa) and North America. As the chart below shows, most of the companies in the benchmark are listed in the United States.

The chart on the facing page shows the average percentage score by country, including only countries with more than one domiciled company. The CCLA UK Modern Slavery Benchmark average has also been added to indicate its relative performance (none of the companies in the global benchmark are domiciled in the United Kingdom).

Key trends

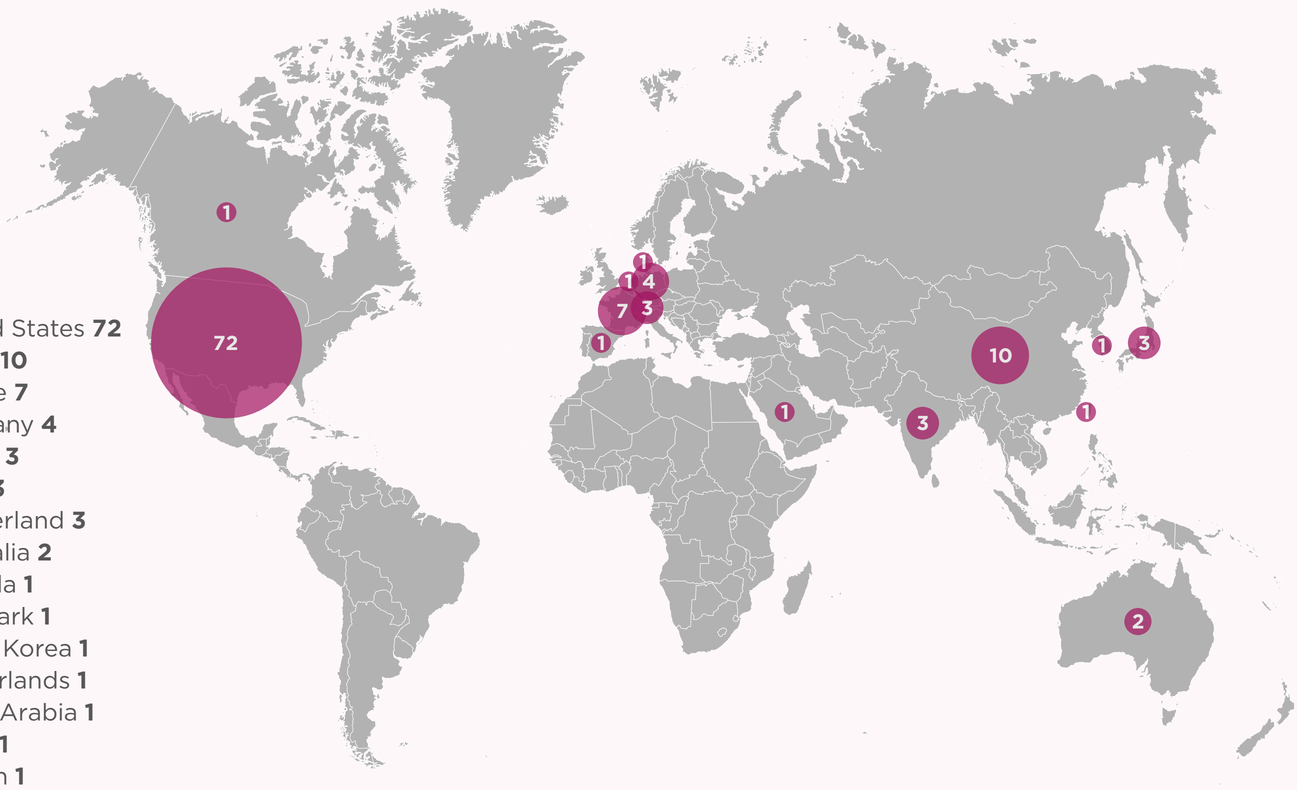
1 Countries with stronger modern slavery legislation perform better

The highest-scoring countries in the benchmark were Australia (77%) and Switzerland (66%). These scores outstrip the UK benchmark average of 60%. It is, however, worth noting that these countries only represent two or three companies each.

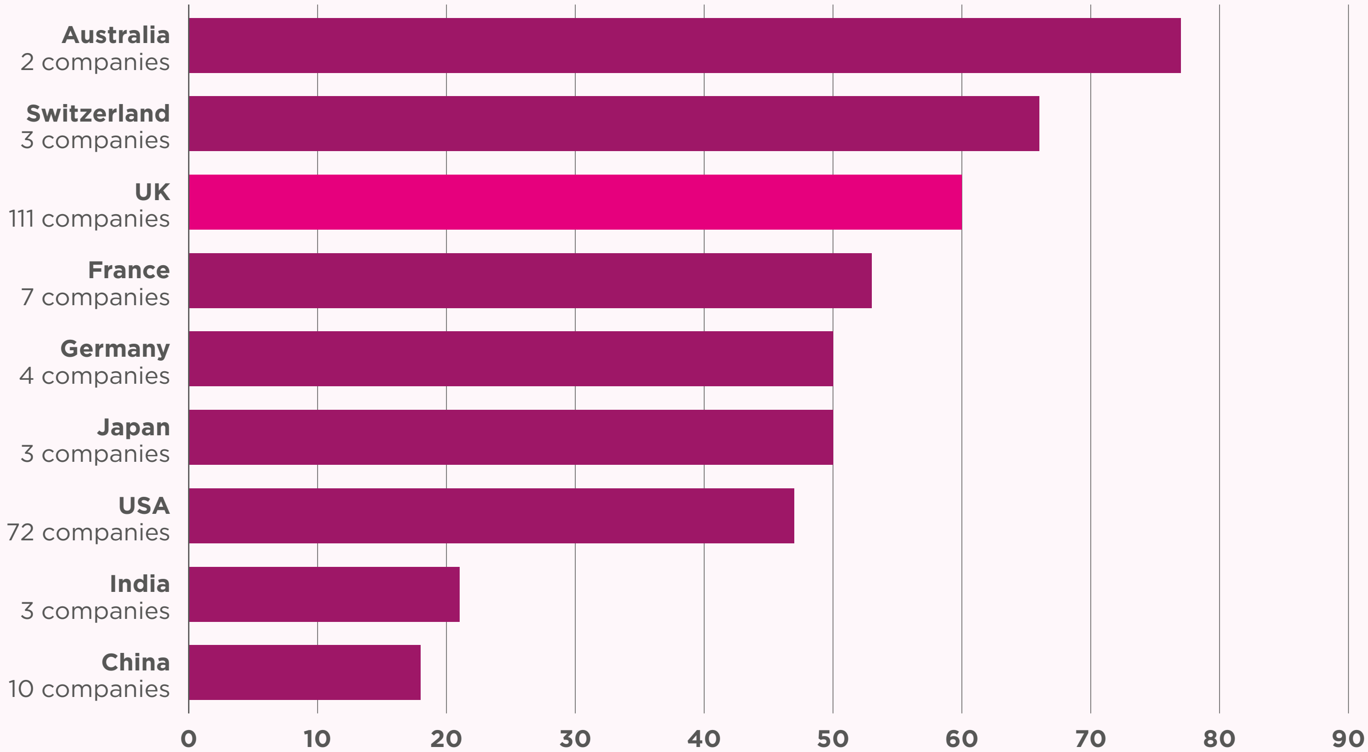
These scores indicate a correlation between countries with more comprehensive human rights legislation and companies that performed well on the benchmark; better human rights legislation seems to lead to better results. The more recent and more stretching Australian Modern Slavery Act 2018 and the Swiss Ordinance on Due Diligence and Transparency 2021 may explain the leading performance of companies domiciled in these countries. We can understand here that companies are willing to actively respond to clearer and more comprehensive legislation,

BENCHMARKED COMPANIES BY COUNTRY OF DOMICILE

United States **72**
China **10**
France **7**
Germany **4**
Japan **3**
India **3**
Switzerland **3**
Australia **2**
Canada **1**
Denmark **1**
South Korea **1**
Netherlands **1**
Saudi Arabia **1**
Spain **1**
Taiwan **1**



PERCENTAGE SCORE BY COUNTRY*



*Countries with only one company domiciled were removed from analysis.

which is promising. We would like to see more global attention dedicated to creating comprehensive human rights legislation going forward.

2 There is a significant gap between the worst-performing countries and the rest

We can also observe a significant discrepancy between the scores of the highest- and lowest-scoring countries in the benchmark. Only China (18%) and India (21%) scored below the benchmark average of 45%, concentrating at the lower end, in tier 5. Such a large disparity between the best- and worst-performing countries shines a light on where there is significant room for improvement in company disclosure and transparency.

3 The efficacy of US legislation varies between sectors

The United States presents an interesting case. While they score just above the benchmark average at 47%, these companies are pulled above that line only by the consumer staples and information technology sectors; without them, the United States would fall to 42%. Stakeholder expectations, voluntary standards and legislation (such as conflict minerals reporting requirements) seem to work more effectively in consumer staples and information technology than in other sectors, particularly health care. This suggests a policy gap could be creating this disparity.

These three trends suggest that companies may welcome the clarity that the UK Home Office's updated 'Transparency in supply chains' guidance provides.[44] Strengthening UK modern slavery legislation can be expected to have an impact on UK company policy.

Emerging themes

1 There is a compliance gap between UK-listed and global companies

Global companies underperform their UK counterparts on the 'UK Modern Slavery Act compliance and registry' section of the benchmark with an average score of 63%, compared with 92% for UK companies. This 29% gap likely reflects the fact that global companies have many human rights reporting requirements and may be less familiar with the details of how to comply with the UK Modern Slavery Act 2015. Furthermore, companies without a UK website are less likely to meet the requirement for the modern slavery statement to be clearly linked on their homepage.

2 Companies still score higher on compliance and conformance with statutory guidance than on the voluntary performance metrics

The average score for 'UK Modern Slavery Act compliance and registry' was 63% and the average score for 'Conformance with UK Home Office guidance on modern slavery' was 62%. These findings contrast with those for the lower-performing sections of the benchmark – 'Find it' (38%), 'Fix it' (18%) and 'Prevent it' (41%) – which are based on the UN Guiding Principles on Business and Human Rights and other international best practice standards. This is a pattern we have seen in every benchmark conducted since 2023 – both the three UK iterations and the global pilot.

3 Performance scores varied significantly between the leaders and laggards

The benchmark shows a large gap between the best performers, which scored up to 85%, and the worst-performing company, which scored 2%. The average benchmark score was 45%, meaning that there is significant room for improvement in corporate reporting and human rights due diligence.

4 Country performance is likely linked to human rights legislation

The data indicates a correlation between companies that perform well on the benchmark and their listing in countries with more comprehensive human rights legislation. More comprehensive legislation seems to lead to better practice. We can infer that companies are willing to respond actively when guidance is given and we would therefore like to see cohesive human rights legislation become a more urgent global priority.

5 A quarter of companies found cases of modern slavery

In total, 27 companies (24%) – across consumer discretionary, consumer staples, financials, health care, information technology and materials – disclosed finding modern slavery in their operations or supply chain. This level of transparency should be recognised and encouraged, given the business concerns of flagging human rights risks. Furthermore, 82% of this group outlined the steps they had taken to end and mitigate ongoing risks. This suggests that once cases have been identified, companies are moving to address them and provide remedy.

Recommendations and looking ahead

Recommendations

Based on the analysis of the benchmark and the themes that emerged, we make various recommendations for companies, investors and policymakers.

Companies

- Ensure human rights reporting meets the requirements of all jurisdictions in which the business operates, including the UK.
- Become familiar with the scope of the UK Modern Slavery Act and the new UK Home Office guidance on transparency in supply chains and conduct a gap analysis at least against the new Level 1 requirements, which have been strengthened.[45]
- Ensure there is strong internal governance on modern slavery – including responsibility at board level and appropriate committees or structures – and be sure to include workers' and relevant stakeholders' perspectives.
- Conduct and disclose detailed operational and supply chain risk assessments. These should include forced labour risks across supply chain locations (beyond tier one) and, importantly, direct operations. Risk assessments should go beyond desk-based assessments to include engagement with people at risk of modern slavery.
- Disclose and provide details of suspected cases of modern slavery, the steps that have been taken to provide remedy for victims, and the outcomes of this process.
- Adopt and disclose responsible procurement practices that enable suppliers to uphold the standards that are in the company's supplier code of conduct and in line with international best practices.

Investors

- Use the CCLA Modern Slavery Global Benchmark 2025 framework in engagement with portfolio companies to identify areas where a company is not performing well and where it can take additional steps.
- In line with CCLA's own practices, consider voting against the financial statements and annual reports of those companies that are in performance tiers 4 or 5 and that do not respond positively to engagement.
- Consider joining collaborative investor engagement programmes such as Find it, Fix it, Prevent it and Rathbones' Votes Against Slavery campaign.[46]

Policymakers

- Provide guidance to global companies to help them decide whether they should report at the subsidiary or group level.
- Mandate companies with UK operations to upload their modern slavery statements to the UK government's Modern Slavery Statement Registry and make it clear that global companies need to comply as well as UK registered companies.[47]
- Ensure that legislation on modern slavery disclosures mandates financial institutions to report on their investing and lending portfolios.
- Introduce mandatory human rights due diligence legislation and align the UK's human rights expectations with international obligations on human rights.

Companies, investors and policymakers

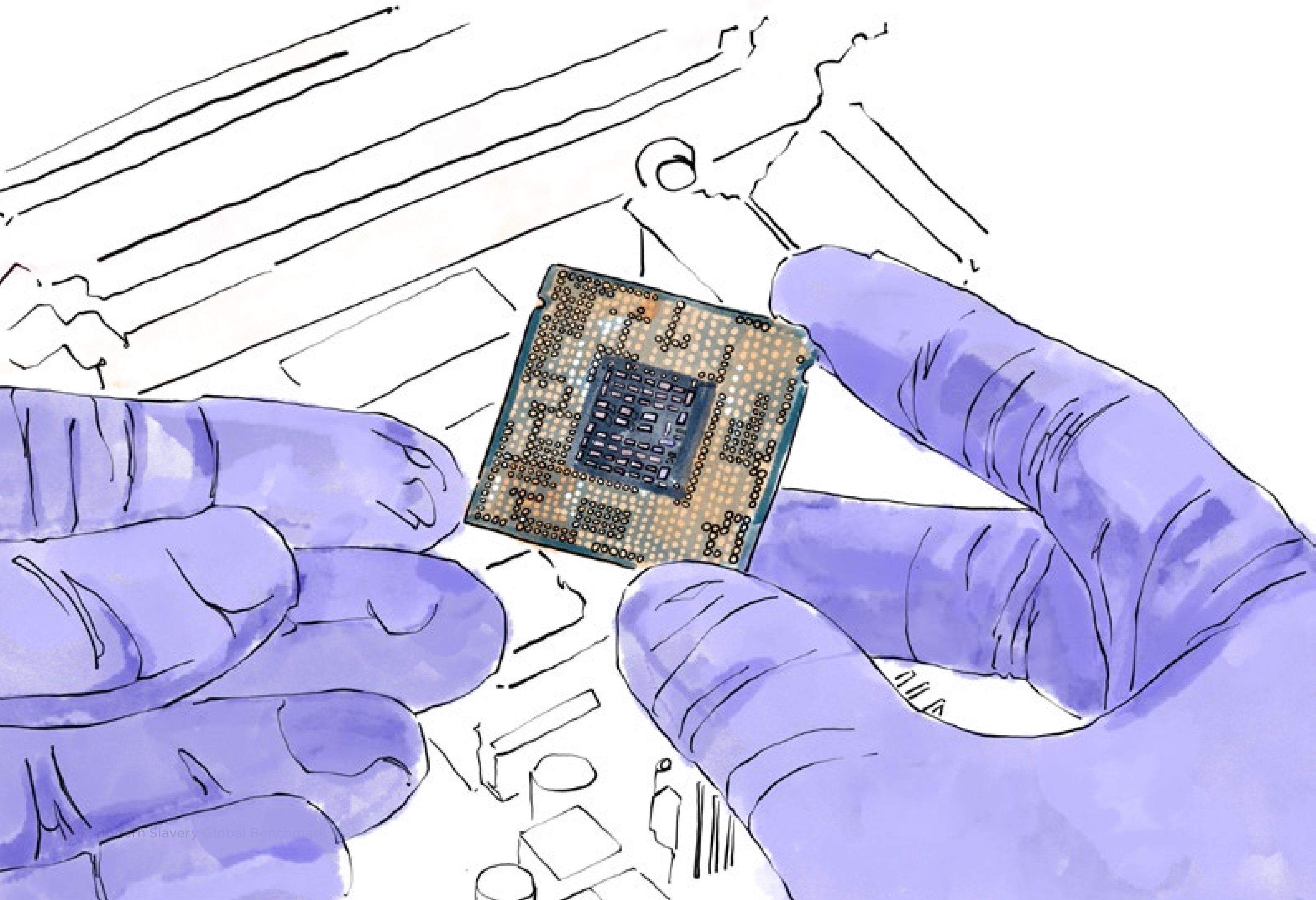
- Closely monitor developments in legislation on corporate sustainability due diligence in the European Union and import bans both there and in the United States.

Looking ahead

CCLA is committed to working to address the scourge of modern slavery, supporting companies in addressing modern slavery risks, and coordinating and developing the Find it, Fix it, Prevent it collaborative investor initiative on modern slavery.

We have developed this benchmark to better understand companies' performance on modern slavery. While we have used it to assess performance and disclosures, the framework also offers a clear way for companies to structure their management processes and their disclosures on modern slavery. Importantly, it provides investors with a tool to help them consider modern slavery when they are forming views on companies, and to guide their active engagement.

In March 2025, the UK Home Office published new guidance titled 'Transparency in supply chains'.[48] We were pleased to contribute to the Home Office Forced Labour Forum and to see the Home Office use some of the metrics in the CCLA Modern Slavery UK Benchmark framework in the updated guidance. However, these developments mean that the framework needs to be updated to remain aligned with the statutory guidance. CCLA has undertaken a gap analysis against the new guidance and has used the opportunity to consider evolving expectations of business in relation to modern slavery and human rights. Next year's benchmark will be undertaken using an updated framework. We will publish the updated framework in January 2026, so most companies will have time to consider the new requirements before publishing their 2026 statements.



Appendix 1:
Methodology

Process

The 111 companies in the CCLA Modern Slavery Global Benchmark 2025 were assessed between 18 August and 19 September 2025.

We worked with environmental, social and governance (ESG) data consultancy Canbury to train a large language model (LLM) to support the assessment of company disclosures.

In this way, we adopted a hybrid approach to the company assessments. Relevant company disclosures were gathered manually on 15 August 2025 and were put through the LLM, which created a scorecard for each company. An extensive human-led quality assurance process was then employed, which involved human assessors checking each data point to ensure accuracy and confidence in the outputs.

This hybrid process enabled the scalable and consistent analysis of large volumes of text (what LLMs are designed to do) while ensuring that the ingrained expert knowledge within CCLA remained core to the process.

Between 22 September and 10 October 2025, companies were invited to review and comment on their preliminary assessments. Companies received their assessment reports individually and could send feedback via a survey link or provide written comments over email. In total, 20 companies provided feedback in this review period, and this was evaluated by the CCLA team. After additional quality checks, the scores were finalised. As a last step, each company received its updated assessment report before the benchmark's publication in January 2026.

How companies were chosen

The companies in the benchmark were selected in March 2025 based on their market capitalisation, inclusion in the pilot project and whether they are in the scope of the UK Modern Slavery Act 2015.

We determined whether a company was in the scope of the Modern Slavery Act using the following criteria from the law. Companies are required to comply if they meet all of the following:

- are a 'body corporate or partnership, wherever incorporated'
- they 'supply goods or services'
- they 'have an annual turnover of £36 million or more'
- they 'carry on a business, or part of a business, in the UK'.[49]

We have interpreted these criteria to mean that companies do not need to supply goods or services or meet the turnover threshold in the UK specifically.

For the third criterion, the Home Office recommends taking a 'common-sense approach' in determining whether companies carry on business in the UK. It also provides a list to help companies self-assess whether they have a demonstrable presence in the UK. The criteria are:

- being registered at UK Companies House
- having UK offices
- providing service or support functions in the UK
- receiving income in the UK
- having another visible UK business presence – for example, a website.[50]

We determined that companies that fulfil more than one of these points carry on a business in the UK. We sourced the relevant data from annual accounts on the Companies House website or from annual reports (or equivalent).

Where companies did not produce a group-level modern slavery statement, we assessed each subsidiary or brand to determine whether it should comply with the Modern Slavery Act. Subsidiaries deemed to be within scope were then included in the assessment process described below.

Accepted sources of evidence for the benchmark assessments

The assessments involved a review of the material available on 15 August 2025 on companies' corporate websites. The primary document used in the assessments was a company's UK modern slavery statement, alongside sustainability reports, annual reports and other relevant publications. Disclosures via additional platforms, such as the reporting function of the UK Modern Slavery Statement Registry, were only assessed for question 2.

Given that the first two sections of the framework are based on the Modern Slavery Act and corresponding Home Office guidance, the only disclosure document scored for these two sections was a company's UK modern slavery statement. Statements pursuant to modern slavery legislation outside the UK were not assessed.

Recognising the reporting burden that many businesses are under, any document that was directly hyperlinked within a company's modern slavery statement was considered an extension of the statement and scored in the second section ('Conformance with UK Home Office guidance on modern slavery').

The 'Find it', 'Fix it' and 'Prevent it' sections of the benchmark assessed any group-level disclosures. The focus of the assessment is on the corporate entity, mirroring investors' interest in how companies are tackling modern slavery across their group operations. However, where one subsidiary makes up more than 40% of a group's total business revenue, its disclosures are in scope for the 'Find it', 'Fix it' and 'Prevent it' sections. This can include a modern slavery statement, human rights report, or sustainability report and these subsidiary disclosures are scored alongside the group's. This did not impact any companies in the current iteration of the benchmark.

For all five sections of the benchmark, where a group UK modern slavery statement did not exist, we assessed each subsidiary in the scope of the Modern Slavery Act using its UK modern slavery statement. In these cases, for the parent company to be awarded points, each underlying subsidiary had to comply.

To ensure that we compared companies on a level playing field, only publications that covered the same time period as the modern slavery statement were scored. This is particularly relevant for annual reports, sustainability reports and integrated reports. We recognise that companies often publish their human rights report and/or sustainability report biannually. Where this was the case, we assessed the most recent report, provided it had been published during the past two reporting cycles. Other disclosures, such as human rights policies and supplier codes of conduct, are considered evergreen.

Appendix 2: Companies assessed

The companies in the benchmark were selected in March 2025 based on their market capitalisation, previous inclusion in the benchmark and whether they are in the scope of the UK Modern Slavery Act 2015.

All disclosures were collected on 15 August 2025. Modern slavery statements were determined to be in scope and were assessed if they had been published in the 15 months prior.

Name	GICS sector	Country of domicile	Modern slavery statement assessed
Abbott Laboratories	Health care	United States	Abbott Laboratories Modern Slavery Act Statement for financial year ending 31 December 2024
AbbVie	Health care	United States	AbbVie Modern Slavery Act Transparency Statement for the year ended 31 December 2024
Accenture	Information technology	United States	Accenture Modern Slavery Transparency Statement 2025
Adobe	Information technology	United States	Adobe 2023 Statement for the UK Modern Slavery Act
Advanced Micro Devices	Information technology	United States	AMD 2024 statement against modern slavery and human trafficking
Agricultural Bank of China	Financials	China	ABC Slavery and Human Trafficking Statement for the financial year ending 31 December 2025
Airbus	Industrials	France	Airbus Modern Slavery Statement including fighting against forced and child labour year ending 31 December 2024
Alibaba Group Holding	Consumer discretionary	China	Alibaba Group Holding had not published an in-scope UK modern slavery statement
Allianz Group	Financials	Germany	Allianz Group Modern Slavery Act Statement for Financial Year Ending December 2024
Alphabet	Communication services	United States	Google 2024 Statement Against Modern Slavery for Financial Year Ending December 2024
Amazon	Consumer discretionary	United States	Amazon Modern Slavery Statement for financial year ending December 31 2024
American Express Co	Financials	United States	American Express Modern Slavery Act Transparency Statement for financial year ending 31 December 2024
Amgen	Health care	United States	Amgen Public Statement UK Modern Slavery Act 2015 for financial year ending 31 December 2024
Apple	Information technology	United States	Apple Modern Slavery Statement for financial year ending 28 September 2024
ASML Holding	Information technology	Netherlands	ASML Holding had not published an in-scope UK modern slavery statement
AT&T	Communication services	United States	AT&T Modern Slavery Report for financial year ending 31 December 2024
Bank of America	Financials	United States	Bank of America Modern Slavery Statement for Financial Year Ending December 31, 2024
Bank of China	Financials	China	Bank of China Slavery and Human Trafficking Statement for Financial Year Ending December 2024
BHP Group	Materials	Australia	BHP Modern Slavery Statement for financial year ending 30 June 2024
BlackRock	Financials	United States	BlackRock Modern Slavery Statement for the year ending 31 December 2024
Blackstone Group	Financials	United States	Blackstone UK Modern Slavery Act Statement for financial year ending March 2024
Booking Holdings	Consumer discretionary	United States	Booking Holdings 2025 Modern Slavery Statement for financial year ending December 31 2024
Boston Scientific	Health care	United States	Boston Scientific Modern Slavery Statement for the year ended December 31, 2024

Name	GICS sector	Country of domicile	Modern slavery statement assessed
Broadcom	Information technology	United States	Broadcom Statement Against Modern Slavery and Human Trafficking for financial year ending November 3, 2024
Caterpillar	Industrials	United States	Caterpillar UK Slavery and Human Trafficking Statement for financial year ending 31 December 2024
Charles Schwab	Financials	United States	Charles Schwab had not published an in-scope UK modern slavery statement
Chevron	Energy	United States	Chevron United Kingdom Modern Slavery Act Statement for financial year ending 31 December 2024
China Construction Bank	Financials	China	China Construction Bank Anti-Slavery and Human Trafficking Statement for the financial year ended 31 December 2024
China Merchants Bank	Financials	China	China Merchants Bank Modern Slavery & Human Trafficking Statement 2024/2025
Cisco Systems	Information technology	United States	Cisco statement on the prevention of modern slavery and human trafficking for financial year ended 27 July 2024
Coca-Cola Co	Consumer staples	United States	Coca-Cola Co Modern Slavery Statement – 2023
Comcast	Communication services	United States	Comcast Statement on modern slavery and supply chain values for financial year ending 31 December 2024
Commonwealth Bank of Australia	Financials	Australia	Commonwealth Bank of Australia 2024 modern slavery and human trafficking statement
ConocoPhillips	Energy	United States	ConocoPhillips United Kingdom Statement on Modern Slavery for the financial year ending December 2024
Contemporary Amperex Technology Co	Industrials	China	Contemporary Amperex Technology Co had not published an in-scope UK modern slavery statement
Costco Wholesale	Consumer staples	United States	Costco Modern Slavery Statement for financial year ended 1 September 2024
Danaher	Health care	United States	Danaher Group Statement on Slavery and Human Trafficking for financial year ended 31 December 2024
Deutsche Telekom	Communication services	Germany	T-Systems Limited Modern and Human Trafficking Statement 2025
Eaton Corporation	Industrials	United States	Eaton Corporation plc disclosure statement under the UK Modern Slavery Act 2015 and California Transparency in Supply Chains Act 2010 for the year ended December 31, 2024
Eli Lilly and Co	Health care	United States	Eli Lilly and Co Statement in Compliance with the Modern Slavery Act 2015
Exxon Mobil	Energy	United States	ExxonMobil Esso UK Limited Slavery and Human Trafficking Statement for Financial Year 2024
GE Aerospace	Industrials	United States	GE Aerospace 2025 UK & Australia Modern Slavery Act statement
Gilead Sciences	Health care	United States	Gilead Statement of Disclosure and Compliance with Section 54 of the Modern Slavery Act (UK) and the California Transparency in Supply Chains Act for the financial year ending 31 December 2024
Goldman Sachs Group	Financials	United States	Goldman Sachs Group Statement on Modern Slavery and Human Trafficking for the year ended December 31, 2024
HDFC Bank	Financials	India	HDFC Bank had not published an in-scope UK modern slavery statement
Hermès International	Consumer discretionary	France	Hermès (GB) Limited Modern Slavery Statement for Financial Year Ending December 2024
Honeywell International	Industrials	United States	Honeywell's 2025 Slavery and Human Trafficking Statement for Financial Year Ending December 2024
Inditex	Consumer discretionary	Spain	Inditex Group Modern Slavery and Human Trafficking in Supply Chain Statement for Financial Year Ending December 2023

Name	GICS sector	Country of domicile	Modern slavery statement assessed
Industrial and Commercial Bank of China	Financials	China	ICBC Slavery and Human Trafficking Statement pursuant to the Modern Slavery Act 2015 for financial year ending 31 December 2024
International Business Machines	Information technology	United States	IBM Modern Slavery Act Transparency Statement for the Financial Year Ending December 2024
Intuit	Information technology	United States	Intuit Limited Statement under the Modern Slavery Act 2015 for financial year ending July 31 2024
Intuitive Surgical	Health care	United States	Intuitive Surgical UK Modern Slavery Statement for Financial Year 2024
Johnson & Johnson	Health care	United States	Johnson & Johnson Global Modern Slavery Statement 2025
JPMorgan Chase & Co	Financials	United States	JPMorgan Chase & Co Modern Slavery Group Statement for year ended 31 December 2024
KKR & Co	Financials	United States	KKR UK Modern Slavery Act Transparency Statement for financial year ending on 31 December 2024
Linde	Materials	United States	BOC modern slavery policy statement 2025
Lockheed Martin	Industrials	United States	Lockheed Martin UK Policy on Supply Chain Transparency concerning modern slavery and human trafficking for 2024 financial year
L'Oréal	Consumer staples	France	L'Oréal UK Modern Slavery Act Statement 2024
LVMH Moet Hennessy Louis Vuitton	Consumer discretionary	France	Belmond Modern Slavery Statement Year ending 31 December 2024 Benefit Cosmetics Modern Slavery Statement for financial year ending 31 December 2024 Berluti SA Anti Modern Slavery Statement 2024 Bulgari UK Modern Slavery Act 2015 Statement and California Transparency in Supply Chains Act of 2010 Disclosure for financial year ending 31 December 2024 Celine UK Modern Slavery Statement for financial year ending 31 December 2024 Chaumet had not published an in-scope UK modern slavery statement Christian Dior Couture Modern Slavery Statement for the financial year ending 31 December 2024 Emilio Pucci had not published an in-scope UK modern slavery statement Fendi UK Ltd Modern Slavery Act Year 2024 Statement Fenty Beauty (Kendo Brands Ltd) Modern Slavery Statement 2024 Fred UK Modern Slavery Act 2015 2023 Statement Fresh Statement on California Transparency in Supply Chains Act of 2010 and UK Modern Slavery Act Givenchy had not published an in-scope UK modern slavery statement Kenzo had not published an in-scope UK modern slavery statement Loewe had not published an in-scope UK modern slavery statement Loro Piana California Transparency in Supply Chains Act of 2010 Disclosure and UK Modern Slavery Act Statement for the financial year ending 31 December 2024 Louis Vuitton UK Ltd Modern Slavery Statement for the financial year ending 31 December 2024

(continued)

Name	GICS sector	Country of domicile	Modern slavery statement assessed
LVMH Moet Hennessy Louis Vuitton (continued)	Consumer discretionary	France	LVMH Fragrance Brands UK had not published an in-scope UK modern slavery statement LVMH Watch & Jewellery (UK) Ltd Slavery and Human Trafficking Statement relating to financial year ended 31 December 2024 MacDonald & Muir Modern Slavery Statement for financial year ending 31 December 2023 Maison Francis Kurkdijan had not published an in-scope UK modern slavery statement Make Up For Ever had not published an in-scope UK modern slavery statement Marc Jacobs Supply Chain Transparency for the financial year ending December 31, 2024 Moet Hennessy had not published an in-scope UK modern slavery statement Parfums Christian Dior UK Ltd 2024 Modern Slavery Statement Repossi UK Anti-Modern Slavery Act Statement 2025 & 2026 Rimowa UK Modern Slavery Act Statement Sephora Modern Slavery Statement 2025 Tiffany & Co. Limited Modern Slavery and Human Trafficking Statement 2024 Zenith had not published an in-scope UK modern slavery statement
Mastercard	Financials	United States	Mastercard modern slavery and human trafficking statement 2024
McDonald’s	Consumer discretionary	United States	McDonald’s UK Modern Slavery Statement 2024
Merck & Co	Health care	United States	Merck Group Modern Slavery Statement 2024
Meta Platforms	Communication services	United States	Meta Platforms anti-slavery and human trafficking statement 2025
Microsoft	Information technology	United States	Microsoft Supply Chain Integrity Statement for the financial year ending 2024
Mitsubishi UFJ Financial Group	Financials	Japan	MUFG Asset Management UK had not published an in-scope UK modern slavery statement MUFG Bank, Ltd. Slavery and Human Trafficking Statement Financial year ending 31 March 2024 MUFG Investor Services Holdings Limited Slavery and Human Trafficking Statement Financial year ending 31 December 2024 MUFG Pension & Market Services Modern Slavery Statement July 2023 – December 2024 MUFG Securities EMEA plc Slavery and Human Trafficking Statement Financial year ending 31 December 2024 MUFG Trust & Banking Corporation Ltd. Slavery and Human Trafficking Statement Financial year ending 31 March 2024
Morgan Stanley	Financials	United States	Morgan Stanley Modern Slavery and Human Trafficking Statement Financial Year 2024
Nestlé	Consumer staples	Switzerland	Nestlé Modern Slavery Statement for the financial year ending 2024
Netflix	Communication services	United States	Netflix UK Modern Slavery Act 2015: Transparency Statement for financial year ending 31 December 2023
Novartis	Health care	Switzerland	Novartis modern slavery statement 2024 Australia, Canada, and United Kingdom
Novo Nordisk	Health care	Denmark	Novo Nordisk Modern Slavery Statement 2024 for the Financial Year Ending December 2024

Name	GICS sector	Country of domicile	Modern slavery statement assessed
NVIDIA	Information technology	United States	NVIDIA 2025 Forced Labor, Human Trafficking, and Child Labor Statement
Oracle	Information technology	United States	Oracle Statement Against Modern Slavery for the financial year ending 2024
Palantir Technologies	Information technology	United States	Palantir Technologies Modern Slavery and Human Trafficking Statement for the financial year ending 2024
PDD Holdings	Consumer discretionary	China	Temu Modern Slavery Statement for the financial year ending 2024
PepsiCo	Consumer staples	United States	PepsiCo modern slavery & human trafficking statement 2024
PetroChina Co	Energy	China	PetroChina Co had not published an in-scope UK modern slavery statement
Pfizer	Health care	United States	Pfizer's 2025 Modern Slavery Statement
Philip Morris International	Consumer staples	United States	Philip Morris UK modern slavery and human trafficking statement for 2023
Procter & Gamble	Consumer staples	United States	Procter & Gamble UK Statement pursuant to the UK Modern Slavery Act 2015 for financial year ended 30 June 2024
Qualcomm	Information technology	United States	Qualcomm Anti-Slavery and Human Trafficking Statement for financial year ended 29 September 2024
Reliance Industries	Energy	India	Reliance Industries had not published an in-scope UK modern slavery statement
Roche Holding	Health care	Switzerland	Roche UK's Modern Slavery Statement for financial year ending 31 December 2024
Royal Bank of Canada	Financials	Canada	Royal Bank of Canada Statement Regarding Modern Slavery 2024
RTX	Industrials	United States	Collins Aerospace had not published an in-scope UK modern slavery statement Pratt & Whitney had not published an in-scope UK modern slavery statement Raytheon Systems Limited Modern Slavery Statement for financial year ending 31 December 2024
S&P Global	Financials	United States	S&P Global Statement on Modern Slavery for the financial year ending 31 December 2023
Salesforce	Information technology	United States	Salesforce FY25 Modern Slavery Act Statement
Samsung Electronics	Information technology	South Korea	Samsung Electronics (UK) Ltd Modern Slavery Act Statement 2024 for the Financial Year Ending December 2024
Sanofi	Health care	France	Sanofi UK Modern Slavery Act Statement 2025
SAP	Information technology	Germany	SAP UK 2024 Modern Slavery Statement
Saudi Aramco	Energy	Saudi Arabia	Saudi Aramco had not published an in-scope UK modern slavery statement
Schneider Electric	Industrials	France	Schneider Electric Modern Slavery Statement for the Financial Year Ending December 2024
ServiceNow	Information technology	United States	ServiceNow's Commitment Against Slavery and Human Trafficking for financial year ended 31 December 2024
Siemens	Industrials	Germany	Siemens UK 2024 Modern Slavery Act Statement
Sony Group	Consumer discretionary	Japan	Sony Group Statement on Slavery and Human Trafficking for financial year ending 31 March 2025
Stryker	Health care	United States	Stryker UK Modern Slavery Statement for financial year ending 31 December 2024

Name	GICS sector	Country of domicile	Modern slavery statement assessed
Tata Consultancy Services	Information technology	India	Tata Consultancy Services Limited and its Subsidiary Companies Statement on Prevention of Modern Slavery and Transparency in Supply Chain for financial year ended 31 March 2024
Tencent Holdings	Communication services	China	Tencent Holdings had not published an in-scope UK modern slavery statement
Tesla	Consumer discretionary	United States	Tesla global modern slavery and child labor transparency statement for financial year ending 31 December 2024
Texas Instruments	Information technology	United States	Texas Instruments Anti-Human Trafficking Statement August 2024
Thermo Fisher Scientific	Health care	United States	Thermo Fisher Scientific Inc. Human Rights and Modern Slavery Transparency Statement 2024
TJX Companies	Consumer discretionary	United States	TJX Modern Slavery Statement for financial year ended 1 February 2025
TotalEnergies	Energy	France	TotalEnergies Holding UK Modern Slavery Statement for 2024 for the Financial Year Ending December 2024 TotalEnergies Marketing UK Modern Slavery Statement for 2024 for the Financial Year Ending December 2024
Toyota Motor	Consumer discretionary	Japan	Toyota's Action Taken for Forced Labour of Migrant Workers (Statement on the Modern Slavery Acts) 2025
TSMC	Information technology	Taiwan	TSMC had not published an in-scope UK modern slavery statement
Uber Technologies	Industrials	United States	Uber Eats UK Modern Slavery Statement for financial year ending 31 December 2024 Uber Mobility UK Modern Slavery Statement for financial year ending 31 December 2024
UnitedHealth Group	Health care	United States	Optum UK Modern Slavery Act Transparency Statement 2024 for the Financial Year Ending December 2024 UnitedHealthcare Global UK Modern Slavery Statement 2024 for the Financial year Ending December 2024
Verizon Communications	Communication services	United States	Verizon UK Modern Slavery Act Statement for financial year ended 31 December 2024
Vertex Pharmaceuticals	Health care	United States	Vertex Modern Slavery and Child Labor Transparency Statement for the year ended December 31, 2024
Visa	Financials	United States	Visa Modern Slavery Transparency Statement for financial year ended 30 September 2024
Walt Disney Co	Communication services	United States	Disney Group UK modern slavery statement 2024
Wells Fargo & Co	Financials	United States	Wells Fargo UK Modern Slavery Act Statement for the year ended December 31, 2024

Data sources: Sustainalytics, 31 March 2025, and corporate websites
GICS = Global Industry Classification Standard

Appendix 3:
Scoring framework and good practice case studies

This section sets out the 48 questions in the CCLA Modern Slavery Global Benchmark 2025.

It also provides examples of good and leading practice on modern slavery for many of the questions. Good practice is evident across all sectors and across all performance tiers. Unless otherwise indicated, case studies for multi-point questions are examples where companies have scored full points.

See the end of this appendix for a key to the standards mentioned.

UK Modern Slavery Act compliance and registry

For this section, only UK modern slavery statements are considered.

Question 1

Did the company include a prominent link to the slavery and human trafficking statement on its homepage?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

The Modern Slavery Act requires companies to publish a modern slavery statement on their website and put it in a prominent place on their homepage.

Scoring

Score	Description
0	There is no direct, clearly labelled link to a modern slavery statement on the website homepage.
1	There is a direct, clearly labelled link to a modern slavery statement on the website homepage.

Explanatory notes

- The link must be visible and clearly labelled on a company's homepage (either group or UK site).
- Links to corporate reporting webpages or general sustainability pages are not sufficient.

Question 2

Had the modern slavery statement been uploaded to the Modern Slavery Statement Registry?

Corresponding standards

None

Rationale

This is not a statutory requirement of the Modern Slavery Act but uploading to the registry is considered part of the spirit of the ‘transparency in supply chains’ ethos that the Modern Slavery Act promotes.

Scoring

0	The modern slavery statement has not been uploaded to the Modern Slavery Statement Registry.
1	The modern slavery statement has been uploaded to the Modern Slavery Statement Registry.

Explanatory notes

- All public disclosures were collected on 15 August 2025, so statements needed to be on the registry on that date to score.

Question 3

Was the statement signed by a director (corporations), a designated member (LLPs) or a partner (partnerships)?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

This is a statutory requirement of the Modern Slavery Act. It ensures that modern slavery processes have appropriate support from senior management and creates a public accountability mechanism.

Scoring

0	There is either a typed signature or no signature from a director on the modern slavery statement.
1	There is a physical signature from a director on the modern slavery statement.

Explanatory notes

- The benchmark specifies a physical signature above a typed name to ensure that senior management have had oversight of the modern slavery statement.

Question 4

Was the statement approved by the board of directors or an equivalent management body (except for LLPs)?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

This is a statutory requirement of the Modern Slavery Act.

Scoring

Score	Description
0	The statement has not been approved by the board of directors.
1	The statement has been approved by the board of directors.

Question 5

Did the company provide an explanation of the steps that it had or had not taken to ensure slavery and human trafficking was not taking place in any part of its business and supply/service chain?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

This is a statutory requirement of the Modern Slavery Act.

Scoring

Score	Description
0	There is no discussion of the steps taken to combat modern slavery.
1	There is an explanation of the steps taken to address modern slavery.

Explanatory notes

- The regulatory requirement is simple: this point is awarded for any discussion, no matter how brief, of the steps a company has taken to address modern slavery in its business or supply/service chain.

Question 6

Did the statement cover the most recent fiscal year?

Corresponding standards

UK Modern Slavery Act 2015

Rationale

The Modern Slavery Act requires companies to report on their progress annually.

Scoring

Score	Description
0	There is no modern slavery statement for the most recent fiscal year.
1	There is a modern slavery statement that covers the most recent fiscal year.

Explanatory notes

- Public disclosures were collected on 15 August 2025.
- Modern slavery statements were considered to be covering the most recent fiscal year if they had been published in the past 15 months.

Conformance with UK Home Office guidance on modern slavery

For this section, modern slavery statements are considered alongside any other documents hyperlinked within them.

Throughout this section, 'business' refers to direct operations rather than the supply/service chain (labour, materials and services) or downstream value chain (customers, clients and investments).

Question 7

To what extent did the company provide information about its **structure**?

Corresponding standards

Home Office guidance 2021

Rationale

'Structure' refers to the legal structure of the company – for example, which parts of the business are covered by its modern slavery statement and whether subsidiaries are included. This is critical contextual information in assessing how a company sets out its approach to modern slavery.

Scoring

- 0 There is no detail given on how the company is structured.
- 1 There is a high-level summary of the corporate structure, including some of the subsidiaries or brands covered by the modern slavery statement.
- 2 There is detailed discussion of the corporate structure and it is immediately clear which subsidiaries are covered by the modern slavery statement.

Question 8

To what extent did the company provide information about its **business**?

Corresponding standards

Home Office guidance 2021

Rationale

Companies must have good oversight of their business to successfully identify modern slavery risks. Equally, a business' core activities, operational model and geographical footprint are important contextual information in assessing its modern slavery approach.

Scoring

- 0 There is no mention of what the business does and where it operates.
- 1 There is a high-level summary of core business activities and/or business operating locations.
- 2 There is detailed discussion of the nature and location of the business activities, as well as the working environment of employees and other associated parties.

Pfizer is a research-based, global biopharmaceutical company. We apply science and our global resources to bring therapies to people that extend and significantly improve their lives through the discovery, development, manufacture, marketing, sale and distribution of biopharmaceutical products worldwide. We work across developed and emerging markets to advance wellness, prevention, treatments and cures that challenge the most feared diseases of our time. We collaborate with healthcare providers, governments and local communities to support and expand access to reliable, affordable healthcare around the world.

Pfizer is headquartered in New York and has operations around the world. As of December 31, 2024, Pfizer had approximately 81,000 employees around the world.

Pfizer operates 37 manufacturing sites worldwide in addition to research and development, commercial, and logistics operations. …

During the Reporting Period, Pfizer Australia's workforce compromised over 925 employees, with approximately 96% hired on a permanent basis, and the remaining 4% on fixed term contracts. Pfizer Australia's employees perform roles from a variety of fields and functions including science, medical, regulatory affairs, manufacturing, sales and marketing, health economics, research and development, as well as administrative services.

Pfizer, '2024 forced labor, child labor, human rights, and decent working conditions regulatory disclosures'[51]

3

Pfizer

Health care

AMD designs and delivers leadership high-performance and adaptive computing solutions, the infrastructure of the digital services and experiences that fuel the daily lives of billions. AMD works closely with partners – leaders in industries spanning technology, automotive, telecom, financial services, gaming, entertainment and many more – to bring their visions to life and enable the future of computing and AI across cloud, edge and end devices.

The AMD global workforce is primarily made up of highly trained professionals with engineers as the largest demographic. As a fabless semiconductor company, AMD manufacturing operations are outsourced to a carefully selected network of Manufacturing Suppliers. 'Manufacturing Suppliers' are defined as suppliers that AMD buys from directly and that provide direct materials and/or manufacturing services to AMD.

Advanced Micro Devices, '2024 AMD statement against modern slavery and human trafficking'[52]

2

Advanced Micro Devices

Information technology

Question 9

To what extent did the company provide information about its **supply/service chains**?

Corresponding standards

Home Office guidance 2021

Rationale

Demonstrating a good understanding of the supply/service chain is critical. Modern slavery can occur at any point along the supply/service chain and therefore companies need to have good oversight of their suppliers to successfully identify modern slavery risks.

Scoring

- **0** There is no or limited information on the geographical distribution of the supply/service chain or the products or services acquired.
- **1** There is minimal information about the main supplier and/or service providers' locations and the products or services sourced.
- **2** There is detailed information about the supply/service chain, including the number of suppliers engaged, the countries suppliers operate in, and the products, commodities or services sourced.

3

Novo Nordisk

Health care

Through our own organisation and supply chain we source raw materials, components, and services to produce Novo Nordisk products in diabetes care and other serious chronic diseases. Novo Nordisk's products are manufactured and assembled in more than 30 countries, with some 450 first-tier suppliers. Novo Nordisk's global supply chain also includes more than 60,000 first-tier indirect suppliers that provide goods, services, transportation, products and services that support our business activities. …

[We have identified] the following as high-risk areas in the global supply chains of Novo Nordisk's products:

- Device components in mainland China, Taiwan, and Thailand
- Medical consumables in Malaysia
- Primary packaging and printed pack materials in mainland China, Brazil, and Mexico
- Construction, warehousing, logistics and other non-core activities for manufacturing sites in Algeria, Bangladesh, mainland China, Egypt, India, Saudi Arabia, and Iran.

Novo Nordisk, 'Modern slavery statement 2024'[53]

As of December 31, 2024, Morgan Stanley procured goods and services from over 13,000 vendors, with the majority in the US and UK. Key categories of goods and services procured included: Information Technology (IT) (e.g., hardware, software, and telecommunications), Non-IT (e.g., advertising, office machines, office supplies, printing, travel and entertainment), Professional Services (e.g., IT consulting, other professional services, and outsourced services) and Space and Occupancy (e.g., design and construction, facilities, furniture and fixtures, and security).

Morgan Stanley, 'Modern slavery and human trafficking statement – financial year 2024'[54]

3

Morgan Stanley

Financials

Question 10

Did the company provide information about its policies in relation to modern slavery?

Corresponding standards

None

Rationale

Corporate attempts to tackle modern slavery should be supported by strong internal governance. Policies are the first step in a company's risk management process.

Scoring

0 There is no evidence that the company has policies in relation to modern slavery.

1 There is evidence that the company has policies in relation to modern slavery.

Question 11

Did the company provide information about its due diligence processes in relation to modern slavery in its **business**?

Corresponding standards

Home Office guidance 2021

Rationale

Due diligence processes are important in protecting workers, helping to identify cases of exploitation and allowing for remediation. This question assesses whether due diligence processes have been implemented within the direct operations of the business.

Scoring

0 There is no discussion of any due diligence processes used within the company's direct operations.

1 There is at least one example of due diligence processes used within the company's direct operations.

Question 12

Did the company provide information about its due diligence processes in relation to modern slavery in its **supply/service chains**?

Corresponding standards

Home Office guidance 2021

Rationale

Due diligence processes are important in protecting workers, helping to identify cases of exploitation and allowing for remediation. Given the global nature of supply/service chains, most companies will be exposed to modern slavery risks and should institute due diligence processes to mitigate these risks.

Scoring

0 There is no discussion of any due diligence processes used within the company's supply/service chains.

1 There is at least one example of due diligence processes used within the company's supply/service chains.

Question 13

Did the company provide information about the parts of its **business** where there is a risk of modern slavery taking place?

Corresponding standards

Home Office guidance 2021

Rationale

This question assesses whether companies have disclosed the parts of their business that have the highest risk of modern slavery. Identifying and disclosing high-risk areas provides evidence that a company has undertaken a risk assessment.

Scoring

0 There is no information given about the parts of the company's direct operations where there are modern slavery risks.

1 There is information about the parts of the company's direct operations where there are modern slavery risks.

2

Sony Group

Consumer discretionary

Sony works with Business for Social Responsibility ('BSR') to conduct group-wide human rights impact assessments to evaluate risks of slavery and human trafficking in our diverse businesses and supply chains. …

Using information from the BSR risk assessments, our processes and controls, and from NGO reports, we determined that Sony's electronics products manufacturing business and its supply chain have a higher risk for potential human rights abuses than other Sony business segments or their supply chains.

Sony Group, 'Sony Group statement on slavery and human trafficking'[55]

“”

According to Verisk Maplecroft, the inherent modern slavery risks in the global mining sector primarily stem from the sector’s corruption susceptibility, presence of vulnerable groups in certain jurisdictions, presence of unskilled or low-skilled workers in some operations and potential exposure to health and safety risks. Verisk Maplecroft rates the countries where we had operated assets in FY2024 (Australia, Canada and Chile) as having low or medium risks of modern slavery, which is consistent with our view that we have a low risk of causing or contributing to modern slavery practices within our operated assets. …

We appreciate our corporate offices are not immune to modern slavery risks – mainly due to supply chain touchpoints with higher-risk sectors, such as cleaning and information technology services. According to Verisk Maplecroft data, some of the countries where we have corporate offices attract higher modern slavery risk ratings. However, we consider that in practice these office activities present a lower risk of causing or contributing to modern slavery practices than our operated assets given the nature of the activities conducted, which include legal, accounting, communications, human resources, risk management, administrative support and economic functions performed by trained professionals on individual employment agreements or contracting arrangements.

BHP Group, ‘Modern slavery statement 2024’[56]

1

BHP Group

Materials

Question 14

Did the company provide information about the parts of its **supply/service chains** where there is a risk of modern slavery taking place?

Corresponding standards

Home Office guidance 2021

Rationale

Disclosing the parts of a supply/service chain with a higher modern slavery risk demonstrates that a risk assessment has taken place. This information is crucial for prioritising additional due diligence and risk management efforts, given that the supply/service chain is often the highest-risk part of any company’s operations.

Scoring

0 There is no information about the geographies, products, commodities or labour types that are part of a company’s supply/service chain and have higher modern slavery risks.

1 There is information about the geographies, products, commodities or labour types that are part of a company’s supply/service chain and have higher modern slavery risks.

3

GE Aerospace

Industrials

Based on our due diligence and risk assessments, we have identified the following general types of modern slavery risks that may be present in our operations and supply chains:

1. Operations – In our operations, modern slavery risks may exist within the population of contingent workers that support GE Aerospace facilities and manufacturing sites. These workers provide janitorial, food/beverage, security and other facility support services. Where reasonable, GE Aerospace will partner with the vendors who provide us with our contingent workers and conduct periodic assessments to verify and validate that our vendors are respecting human rights and complying with our standards and expectations.
2. Supply Chain – Due to the nature of GE Aerospace's products and services, potential sources of modern slavery risks include manufacturing sites in higher risk countries; mineral sourcing deep in our supply chain; and use of low-skilled and/or migrant workers from subcontractors. Our modern slavery risks are most acute in those parts of our supply chain where we have limited or no visibility, such as subcontractors using seasonal, low-skilled, and/or migrant labor and pre-smelter mineral sourcing.

GE Aerospace, '2025 UK & Australia Modern Slavery Act statement'[57]

3

Bank of America

Financials

Our supply chain is comprised of more than 3,900 active suppliers globally. A significant majority are providers of professional services, such as contract labor, legal services, marketing services, software services and real estate services. While we source from many countries, most of our suppliers provide services from the United States.

We conduct regular reviews of our internal business operations and supply chain to identify modern slavery risks, including monitoring of business being conducted with or on behalf of Bank of America by suppliers who use low or unskilled labor. These include suppliers responsible for facilities and shipping services and suppliers that manufacture hardware and other durable goods.

Bank of America, 'Bank of America modern slavery statement'[58]

Question 15

Did the company describe steps it had taken to **assess** the risk of modern slavery in its **business**?

Corresponding standards

Home Office guidance 2021

Rationale

Companies need to prioritise resource-intensive due diligence mechanisms for the parts of their business where the modern slavery risks are the highest. To do this, they should conduct a comprehensive risk assessment for their direct operations and supply/service chain (although this question only covers a company's direct operations).

Scoring

0 There is no information about how a business risk assessment was conducted.

1 There is information about the ways in which risk assessments are conducted for direct operations and how this process results in an active risk management approach.

2

Novartis

Health care

Novartis operations

Every year we conduct an internal cross-functional risk saliency exercise using the UNGPs scope, scale and remediability principles to identify our most salient human rights risks in our own operations and our value chain. Based on this assessment and ongoing due diligence of Novartis operations globally, we believe there is a low risk of modern slavery in our own operations. Our conclusion is based on assessments of relevant business units and specific markets that were classified as high risk in our human rights country risk assessment tool, which comprises 15 publicly available human rights indices.

Novartis, 'Modern slavery statement 2024 – Australia, Canada, and United Kingdom'[59]

3

Mastercard

Financials

We regularly identify and assess environmental, social and governance matters by evaluating Mastercard's impact on society and the environment, and the risks and opportunities to our business. We do this by conducting Double Materiality Assessments which are informed through consultation with internal representatives as proxies for key stakeholders and consider the nature of our business (including our status as a regulated provider of payment services), and our existing policies and procedures.

In 2024, we completed a Double Materiality Assessment which informed our current impact strategies and priorities. This included modern slavery and human trafficking related impact assessments across our own workforce and workers in our supply chain to help us assess the human rights most correlated to our business.

Mastercard, 'Mastercard modern slavery and human trafficking statement'[60]

Question 16

Did the company describe steps it had taken to **manage** the risk of modern slavery in its **business**?

Corresponding standards

Home Office guidance 2021

Rationale

Managing and mitigating the risk of modern slavery within direct operations is a material and salient issue for companies. Risk management processes are crucial for protecting workers and also for limiting the potential reputational risk incurred by modern slavery cases.

Scoring

Score	Description
0	There is no information about the company's business risk management process.
1	There is information about the risk management process the company uses in its direct operations and how this process results in an active risk management approach.

Question 17

Did the company describe steps it had taken to **assess** the risk of modern slavery in its **supply/service chains**?

Corresponding standards

Home Office guidance 2021

Rationale

Companies need to prioritise resource-intensive due diligence mechanisms for the parts of their supply/service chains where the modern slavery risks are the highest. To do this, they should conduct a comprehensive risk assessment for their direct operations and supply/service chain (although this question only covers a company's supply/service chain).

Scoring

Score	Description
0	There is no information about how a supply/service chain risk assessment was conducted.
1	There is information about the ways in which risk assessments are conducted for the supply/service chain and how this process results in an active risk management approach.

We regularly assess modern slavery risk in our business and supply chains. Our assessments identify higher risk areas of our business based on external reports and standards, country and sector risk profiles, previous assessments, supplier questionnaires, and input from experts in this area. In addition, to assess supplier-specific risk, we consider the industry, work type, geography, and supplier performance against our Supplier Code of Conduct, among other factors. …

Our due diligence process is conducted on a continuous basis; it involves assessing suppliers for social, environmental and ethical risks, including modern slavery risks. As part of the due diligence process, higher-risk suppliers complete a self-assessment questionnaire about their working conditions and management systems. In certain cases, we utilize third party evaluation of a supplier's working conditions and management systems in lieu of a questionnaire. The due diligence process also includes supplier background checks, examination of labor-related red flags that appear in publicly available databases and media sources, and a review of higher-risk suppliers' names against human trafficking watch lists and sanctions lists. …

We work with independent parties to conduct periodic audits of our higher-risk suppliers' facilities. Our audits include in-depth facility reviews, meetings with management, on-site worker interviews, document reviews, and assessments of ancillary workplace facilities, such as dormitories, cafeterias, wastewater treatment facilities, and warehouses.

Alphabet, '2024 statement against modern slavery'[61]

2

Alphabet

Communication services

Schneider Electric has built a supplier vigilance plan in which a risk analysis of its suppliers is conducted with the help of a recognized third-party expert mapping tool available through the Responsible Business Alliance (RBA). All tier 1 suppliers are assessed with this tool (53,000+) and the methodology is refreshed every year. To that regard, Schneider Electric is fully aligned with the framework developed and shared by the RBA (36 questions on Human Rights and decent workplace).

Based on this analysis, the Group identified 1,400+ 'high risk' suppliers in 2023 and the 2021–2025 overall ambition [assessed via our Schneider Sustainability Impact dashboard, or] … SSI is to cover 1,000 suppliers through on-site audits, directly or through third parties, and 3,000 through a remote assessment, from a 2018 baseline.

Schneider Electric, '2024 Schneider Electric modern slavery statement'[62]

2

Schneider Electric

Industrials

Question 18

Did the company describe steps it had taken to **manage** the risk of modern slavery in its **supply/service chains**?

Corresponding standards

Home Office guidance 2021

Rationale

Managing and mitigating the risk of modern slavery within the supply chain is a material and salient issue for companies. Risk management processes are crucial for protecting workers in the supply/service chain, who in many cases are at higher risk for modern slavery than direct employees.

Scoring

0	There is no information about the company's supply/service chain risk management process.
1	There is information about the risk management process the company uses in its supply/service chains and how this process results in an active risk management approach.

Question 19

Did the company provide information about its effectiveness in eliminating modern slavery from its business or supply chains, measured against such performance indicators as it considered appropriate?

Corresponding standards

Home Office guidance 2021

Rationale

Monitoring is key to understanding how well a company's approach to modern slavery is working and where there are gaps. Setting key performance indicators (KPIs) and reporting against them allows companies to track their progress and demonstrate their ongoing commitment to developing their approach.

Scoring

0	There is no disclosure of KPIs and/or no evidence that the company is tracking and reporting its progress against these targets.
1	There is disclosure of the KPIs used and evidence of reporting against these targets.

2

Commonwealth Bank of Australia

Financials

Monitoring the effectiveness of our actions | Key outcomes monitored in FY24

Examples of targeted outcomes[29]	Key evaluation questions	Indicators	30 June 2024	30 June 2023	30 June 2022
CBA employees have increased awareness and access to channels to report issues and concerns, including for modern slavery.	Do CBA employees have adequate access to training to raise their awareness of modern slavery in order to identify and report issues and concerns?	Percentage of training completion rate - Code of Conduct[30]	99.9%	99.8%	99.6%
CBA employees have improved skills to conduct risk assessments, onboarding, transaction screening and ongoing due diligence.		Number of ESG trainings completed (headcount)	13,023	13,552	2,911
		Total ESG learnings completed/attended[31] *Fundamental* *Specialised*	*20,609* *2,799*	*24,682* *4,885*	- -
CBA has increased understanding of its current and potential modern slavery risk exposure and the presence of modern slavery occurring within the supply chain.	Is CBA's approach to identifying and assessing CBA Suppliers for modern slavery risk appropriately targeted?	Number of Inherent Risk Assessments completed in the SRG tool (unique suppliers)[32]	2,059	1,306	1,105
		Number of Humans Rights Control Programs[33] completed in the SRG tool (unique suppliers)[32]	117	176	60
CBA Suppliers have increased awareness of actions to improve employment practices and reduce risk of modern slavery occurring within their own operations and supply chain.	Has the Supplier Improvement Plan supported relevant CBA Suppliers to improve modern slavery risk management practices?	Number of suppliers flagged for a Supplier Improvement Plan review[32]	22	38	8
		Number of Supplier Improvement Plans in progress[32]	17	13	11
		Number of Supplier Improvement Plans completed[32]	11	8	1

Commonwealth Bank of Australia, '2024 modern slavery and human trafficking statement'[63]

2

Costco Wholesale

Consumer staples

Grievance reporting KPIs	FY24	FY23
Human-rights related grievances investigated and addressed as noted above	12	13

eLearning KPIs	FY24	FY23
Lessons completed by Costco suppliers and/or their facilities	12,509	9,046
Lessons completed by Costco suppliers and/or their facilities on forced labor-specific topics, such as: Recognizing Forced Labor, Forced Labor Prevention for Factories, Forced Labor Due Diligence, Preventing Forced Labor during Recruitment, Forced Labor Prevention for Farms, and Hiring and Working with Migrant Workers.	1,340	470

Costco Wholesale, 'Costco Wholesale UK Ltd. modern slavery statement'[64]

Question 20

Did the company provide information about modern slavery training provided to staff?

Corresponding standards

Home Office guidance 2021

Rationale

Training is a key part of embedding a modern slavery governance structure. Training helps staff to identify modern slavery cases and risks. It also helps to support broader business policies and practices by making modern slavery a clear priority on the company's agenda.

Scoring

0 There is no information about staff training on modern slavery.

1 There is information about staff training on modern slavery.

Find it

For this section, all information disclosed by the company in the public domain is eligible for consideration.

In this framework, we consider tier one to consist of suppliers with a direct relationship with the business, excluding buying agents. The tier two supply chain consists of the direct suppliers to tier one, and so on. See page 27 of the CCLA Modern Slavery UK Benchmark 2025 for more information.

Question 21

Did the company state that it is continuing to map the extent of its operations and supply/service chains?

Corresponding standards

BHRRC 4.3

Rationale

Mapping the supply/service chain is an ongoing process undertaken to understand where products come from and where tier-one suppliers' sub-suppliers are located. This process is crucial in combatting modern slavery because visualising the supply/service chain allows for high-risk areas and groups to be identified. Given the ever-changing nature of business relationships and supply/service chains, companies should engage in ongoing mapping.

Scoring

0 There is neither evidence of current supply/service chain mapping nor a commitment to continue this process.

1 There is evidence that the company has started mapping the supply/service chain beyond tier one and there may also be evidence that it is continuing this process.

> To address the increasing volatility and uncertainty in the supply chain, Samsung Electronics is gradually expanding our information management to include not only first-tier suppliers but also sub-suppliers that supply key items. We map supply chain information (Supply Tree) for major suppliers and items to construct and operate a supply chain map. Utilizing collected information, such as actual production site details, we quickly respond to various supply chain issues.

Samsung Electronics, 'Samsung Electronics sustainability report 2025'[65]

1

Samsung Electronics

Information technology

> We have implemented an extensive data collection program that has allowed us to map and better understand where our suppliers concentrate manufacturing of key products and components. With this improved visibility, we will continually evaluate our supplier base to ensure we are achieving an industry-leading cost structure balanced with risk mitigation and resiliency.

AT&T, 'Responsible supply chain'[66]

3

AT&T

Communication services

Question 22

Did the company disclose the locations of its tier-one suppliers?

Corresponding standards

BHRRC 1.5; KTC 2.1

Rationale

Understanding where tier-one suppliers are located is a crucial first step in a modern slavery risk assessment.

Scoring

Score	Description
0	There are no disclosures of tier-one supplier locations, or locations are given as continents or regions.
1	There is a partial list of supplier locations, to at least country level.
2	There is a list of supplier locations with addresses, covering all suppliers or a high-risk sector.

3 £

S&P Global

Financials

Market Intelligence

Entity	Service	Entity country
4D Data Centres LTD	Data center	United Kingdom
ADM Associates, Inc.	Implementation services	United States
Amazon Web Services Inc (AWS)	Cloud services	United States
Bottomline	Secure messaging	United Kingdom
Box, Inc.	Data room services	United States
Bundesanzeiger Verlag GmbH	KYC [know your customer] profiles	Germany

S&P Global, 'S&P Global list of sub processors'[67]

Note: this is an example of good practice for disclosing a list of supplier locations to a country level (1 point).

1

Nestlé

Consumer staples

Direct Supplier (Tier 1)	Mill Company Name	Mill Name	Country
Ab Azucarera Iberia S.L.	Ab Azucarera Iberia, S.L.	Azucarera Toro	Spain
Ab Azucarera Iberia S.L.	ADECOAGRO VALE DO IVINHEMA S/A.	Usina Monte Alegre (UMA)	Brazil
Ab Azucarera Iberia S.L.	Bevap, Bioenergética Vale Do Paracatu S/A	Bevap, Bioenergética Vale Do Paracatu S/A	Brazil

Nestlé, 'Nestlé supply chain disclosure: sugar'[68]

Question 23

Did the company disclose the locations of its suppliers beyond tier one?

Corresponding standards

BHRRC 1.5; KTC 2.1

Rationale

Mapping suppliers beyond tier one is necessary for comprehensive supply chain transparency. Evidence has shown that further down the supply chain, workers are more vulnerable to modern slavery. Understanding where sub-suppliers are located allows companies to point to the riskiest parts of their business.

Scoring

- 0 There are no disclosures of tier two or lower supplier locations, or locations are given as continents or regions.
- 1 There is disclosure of tier two or lower supplier locations to at least the country level.

Question 24

Did the company provide details of how it analyses the overall supply/service chain by risk (e.g. in relation to sourcing, geography, commodity, manufacture and spend)?

Corresponding standards

BHRRC 1.5; KTC 2.1

Rationale

Given the complexity of global supply chains, having a sophisticated risk assessment process is key in assessing where due diligence should be prioritised. Disclosing how risk factors are integrated into a risk assessment is one way to show a robust process. It is best practice to have ongoing monitoring using site-level data, and this is awarded the highest number of points.

Scoring

0	There is no disclosure of the factors that influence the risk assessment process.
1	There is disclosure of the factors that influence the risk assessment process.
2	There are detailed disclosures of how specific geographies, commodities and/or sectors affect how risk assessments are conducted.
3	There is disclosure of how risk assessment data gathered on-site influence the risk assessment process.

Over the last four years, Disney has collaborated with the Responsible Sourcing Network's YESS: Yarn Ethically & Sustainably Sourced program to develop assessment and auditing standards at the spinning and fabric mill level for cotton. The objective is to work collaboratively to create tools and guidance that can identify, assess and address the risk of forced labour in cotton production.

Walt Disney Co, 'UK modern slavery statement 2024'[69]

3

Walt Disney Co

Communication services

Note: this is an example of leading practice in demonstrating how geography, commodity or sector influences a modern slavery risk assessment (2 points).

1

Cisco Systems

Information technology

Cisco assesses the effectiveness of the risk assessment process and continuously works to improve the process, including an annual review to maintain relevance to our operations with updated risk indicators, newly available data, and accounts for lessons learned over the past year. ...

Each year, we aim to continuously improve our due diligence processes based on what we have learned. Recently, forced labor risks have been uncovered most commonly in assessments of new components suppliers, new facility locations, and [scenarios where we] extend our reach into our sub-tier suppliers with whom we do not have direct contractual relationships. Accordingly, we have strengthened our due diligence during our new supplier and new site onboarding processes and during acquisition integration processes.

Cisco Systems 'Cisco statement on the prevention of modern slavery and human trafficking'[70]

Question 25

Did the company provide information on the workforce in both its **operations** and its **supply/service chain**?

Corresponding standards

KTC 2.1

Rationale

Knowing the number of employees in a company's direct operations and supply/service chain is another part of mapping the supply/service chain. It allows companies to visualise their workforce, identify risks and know who it is responsible for.

Scoring

0 No information is given or the only information disclosed is the number of direct employees.

1 The number of direct employees and the number of workers in the supply/service chain have both been disclosed, demonstrating that the company understands the scope of its workforce.

2 There is a more detailed breakdown of the supply/service chain workforce by location or vulnerable characteristics, in addition to disclosure of the number of direct employees and supply/service chain workers.

2

Tesla

Consumer discretionary

In 2024, we increased the total number of supplier site responses by 44%, for a total of over 1,400 total SAQ [supplier self-assessment questionnaire] submissions. Submissions reflect facilities across 40+ countries that employ over 2 million supply chain workers.

Tesla, 'Tesla global modern slavery and child labor transparency statement'[71]

> To date, 740 potentially high-risk suppliers in terms of Human Rights have been audited, in 86 countries, involving 100 affiliates and covering 230,000 people. For 385 suppliers, it was necessary to implement action and monitoring plans, 171 of which led to complete improvements (validated by a follow-up audit) positively impacting the working conditions of more than 60,000 of their employees.
>
> TotalEnergies, 'Human rights briefing paper 2018–2023'[72]

3

TotalEnergies

Energy

Question 26

Did the company identify the recruitment of migrants or temporary labour as a human rights risk?

Corresponding standards

KTC 2.1

Rationale

Indirect methods of recruitment and lack of permanent contracts can make workers more vulnerable to labour exploitation. The issues of debt bondage and recruitment fees particularly affect migrants, alongside other temporary staff. Recognising the risks migrants and other temporary workers face is a crucial first step for companies to take.

Scoring

- **0** The risks surrounding the recruitment of migrants and other temporary labour are not identified.
- **1** Migrant or temporary workers are identified as strongly at risk of modern slavery.

Question 27

If so, had the company provided details of how migrants and/or temporary labour are recruited?

Corresponding standards

None

Rationale

Given the higher risk that migrants face, companies should disclose the methods they use to monitor migrant and/or temporary labour and the recruitment practices they use to avoid exploitation, above and beyond standard recruitment procedures.

Scoring

- **0** No information is given about the recruitment of migrant or temporary labour.
- **1** Details are disclosed of risk management processes specifically related to the recruitment of migrant and/or temporary labour.

2

Apple

Information technology

“”

We require independent, third-party assessments to verify that no one is forced to work, and that people's rights are respected throughout their employment journey. … Foreign Contract Workers face additional risks in the process of securing a job. For this reason, we carry out additional specialized audits at facilities where Foreign Contract Workers are employed, or those located in higher-risk areas. In 2024, 37 specialized audits were conducted at supplier facilities employing Foreign Contract Workers in five countries and regions. Each audit includes verification of documents from suppliers and their labor agents, as well as interviews with labor agents and Foreign Contract Workers. …

In 2018, we started mapping higher-risk migration corridors using our own data, as well as publicly available information from the ILO and the U.S. State Department's 'Trafficking in Persons Report.' Higher-risk migration corridors are those countries of origin and destination that Foreign Contract Workers travel between that present particular risks due to geopolitical or socio-economic factors, among others.

Since 2020, we've expanded this work by conducting extensive mapping of the labor agencies in our supply chain to further understand all recruitment channels, regardless of whether suppliers recruit domestic labor or Foreign Contract Workers. This work starts even before a prospective supplier becomes part of our supply chain. …

For Foreign Contract Workers specifically, our Code and Standards require that they receive pre-departure training in their country of origin, onboarding training upon arrival in their destination country, as well as regular refresher training.

Apple, 'People and environment in our supply chain 2025 annual progress report'[73]

3

Novo Nordisk

Health care

“”

For migrant Workers, Suppliers must (i) provide their employment contract in the Worker's native language prior to departure from their country of origin, or (ii) ensure and, if necessary, document that the migrant Worker understands the language in which the employment contract is provided. …

The Supplier must ensure that no Worker is required to pay any fees or incur any costs during the recruitment process to secure employment such as obtaining residency permits, work visas, medical insurance, travel, skills training etc., and the Supplier must cover such expenses on behalf of Workers.

Novo Nordisk, 'Responsible sourcing standard'[74]

Question 28

Did the company provide details of how the risk assessment of its operations and supply/service chain was carried out, including which indicators, resources and tools were used and/or which experts, stakeholders and civil society organisations were consulted?

Corresponding standards

BHRRC 3.6, 4.2, 4.5, 4.6, 4.7; KTC 1.5, 2.2; S2G 19, 20; UNGPRF B2

Rationale

The tools used in a risk assessment are another way to judge the sophistication of the process. Direct worker engagement is the most effective way to identify modern slavery risks and cases. In many instances this is challenging, which is why we consider industry or multi-stakeholder initiatives related to modern slavery, which tend to have contact with localities, as an interim stage between desk-based analysis and local dialogue.

Scoring

- 0 There is no information about the tools used to conduct the risk assessment.
- 1 The risk assessment is founded on desk-based analysis.
- 2 The risk assessment process engages with multi-stakeholder or industry initiatives related to modern slavery.
- 3 The risk assessment incorporates dialogue with the rights holders themselves or their representatives on the ground.

In 2024 we continued to support supply chain worker engagement via anonymous mobile and web-based surveys to collect and analyze worker feedback on topics like job satisfaction, working conditions, grievance mechanisms, and training effectiveness across several countries. Depending on the country where the survey is deployed and whether high-risk factors are present, these surveys have targeted questions to screen for forced labor risks such as the withholding or retention of identity documents and payment of recruitment fees. Based on these surveys and worker responses, we implemented tailored factory improvement programs in partnership with suppliers.

Meta Platforms, 'Anti-slavery and human trafficking statement 2025'[75]

3

Meta Platforms

Communication services

3

TotalEnergies

Energy

In addition, aware of the importance of guaranteeing respect for working conditions on the sites of major construction projects, TotalEnergies has tested an innovative complementary approach to the already existing audit and complaint reporting systems. In 2023, the Company implemented a pilot 'workers' voice survey' within two of its large industrial projects: Tilenga in Uganda and EACOP [East African Crude Oil Pipeline Project] in Tanzania. This pilot aims to directly interview workers of tier-one suppliers and above via their mobile phones in order to collect information on respect for human rights and working conditions on site.

TotalEnergies, 'Universal registration document 2024'[76]

Question 29

Did the company disclose its most salient modern slavery risks?

Corresponding standards

BHRRC 4.1, 4.4, 4.8, 4.9;
KTC 2.2; S2G 17; UNGPRF B1

Rationale

The UN Guiding Principles Reporting Framework defines salient human rights issues as 'the human rights at risk of the most severe negative impact through the company's activities and business relationships'.[77] This means companies should disclose risks to workers or rights holders, rather than high-risk business areas. Naming the salient risks is a characteristic of a risk assessment that centres the impact of modern slavery on the workers rather than the business.

Scoring

0	There are no named salient risks and/or the company has not described how these risks could manifest in its business.
1	The company has named salient risks and described their likelihood and how they can occur.

Forced labor was identified as one of our salient human rights issues during our most recent review in 2022.

PepsiCo, 'Modern slavery & human trafficking statement 2024'[78]

2

PepsiCo

Consumer staples

Recognizing the scale of our value chain and the inherent complexities involved in global agricultural supply chains, we have identified several worker groups that have a higher risk of experiencing forced labor related impacts across our value chain. These groups include migrant workers, women, young workers, and temporary and contract workers. We have and are continuing to focus our efforts on addressing the forced labor related impacts most frequently encountered by these groups, including bonded labor and recruitment fees.

PepsiCo, 'PepsiCo salient human rights issues update'[79]

Through the salient issue identification process, the Company has developed an understanding of how workers with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at higher risk of harm. This analysis took into account publicly available indices supporting the identification of geographies or commodities or nature of activities where there may be higher risk, including related to health and safety and/or child/forced labour. From that analysis, dimensions and characteristics that appeared relevant for the Company as differentiating factors for workers in the value chain to be potentially more impacted are identified as follows:

- Forced labour: supply chain workers, including in situ contractors, particularly migrant workers (both foreign and domestic). Security and cleaning services as commodities, are considered particularly at risk of forced labour.
- Child labour: supply chain workers, particularly those engaged in the sourcing of raw materials.
- Health and safety: supply chain workers, including in situ contractors.

For each of these potential adverse impacts, the Company prioritises high risk countries and activities through the application of a risk-based analysis of both the supplier's geographical location and nature of their activity using publicly available indices.

Airbus, 'Airbus SE modern slavery statement'[80]

3

Airbus

Industrials

Question 30

Did the company include a discussion of which supply/service chain auditors or partners it had appointed, including how it had assured the competency of the appointed auditors or partners in finding and detecting modern slavery?

Corresponding standards

BHRRC 3.4; KTC 6.2.4 (modified)

Rationale

Due diligence procedures will vary but are a crucial part of a company's approach to modern slavery. Social auditing or the use of third-party monitors is one of the most common approaches to understanding risk in a supply/service chain. However, it is not without its critics, who point to significant flaws and opportunities for audit fraud. Companies should ensure that auditors or partners are suitably qualified to identify modern slavery where it may exist.

Scoring

0 The company gives no information about how the competency of its auditors or partners has been assured.

1 The company gives information about how it has verified the competency of its auditors or partners through disclosing auditor accreditation, using human rights specialists, disclosing multiple specialist audit techniques used and/or internally reviewing third-party audits to check their effectiveness.

3

Roche Holding

Health care

We conduct on-site audits at high-risk suppliers through which we directly evaluate supplier human rights compliance and overall supplier performance against the requirements of the Roche Supplier Code of Conduct via our PSCI-based SSAV [Supplier Sustainability Assurance Visit] programme. … Key characteristics of SSAV include the following:

- A regularly updated list of auditable suppliers, identified for inclusion on the list by the risk-based method previously described
- An annual audit plan that is communicated to all relevant internal stakeholders (e.g. supplier relationship managers, Global Procurement leadership and risk managers)
- Use of PSCI-approved independent auditors
- Documented audit reports using PSCI templates and following PSCI standard for classifying findings based on level of risk
- Documented action plans submitted by the audited suppliers and monitored to timely closure
- Follow-up audits to ensure both adequacy of action plans and continuous improvement
- Disclosure of programme KPIs through various Roche public reporting mechanisms, including Roche's external website
- A documented SSAV programme manual describing all aspects of the programme

The SSAV programme also embeds sub-tier oversight per PSCI protocols, based on the transparency obligations our suppliers commit to according to the Roche Supplier Code of Conduct. Therefore, SSAV audits include the following:

- A review of the supplier programmes and management systems in place to ensure that the human rights of the supplier's own suppliers are adequately protected
- The direct assessment of human rights and labour compliance associated with any sub-tier suppliers working at supplier sites during the time of the audit.

Roche Holding (2025), 'Annual report 2024'[81]

2

Philip Morris International

Consumer staples

For its electronics suppliers, PMI [Philip Morris International] continued to leverage resources from the Responsible Business Alliance (RBA) and gathering data through the Validated Assessment Program (VAP) and Customer Managed Audits (CMAs) during the year. …

[For its Agricultural Labour Practices (ALP) programme] internal farm-by-farm monitoring is complemented by external assessments performed by Control Union, an independent third-party auditor who checks ALP program implementation and progress (from a management system perspective) and by local specialized third parties that verify social practices in high-risk markets.

Philip Morris International, 'Philip Morris UK modern slavery and human trafficking statement for 2023'[82]

Question 31

Did the company disclose how suppliers were prioritised for audit purposes?

Corresponding standards

None

Rationale

All companies with a supplier audit policy will have a prioritisation process. Some will decide to audit all suppliers supplying goods for resale, but others may audit based on risk level. This question seeks to understand what that process is, rather than judging its suitability for addressing the risks.

Scoring

Score	Description
0	There is no information on the audit prioritisation process.
1	There is a discussion of the audit prioritisation process.

Question 32

To what extent did the company include a discussion of its audit protocols?

Corresponding standards

KTC 6.1

Rationale

A comprehensive audit process is crucial for combatting modern slavery. This question seeks to understand how robust a company's audits are. Protocols such as unannounced visits, off-site interviews and audits of associated production facilities demonstrate an advanced audit process that has ways to ensure audit integrity and elicit more information from workers who are unwilling to share in front of management.

Scoring

Score	Description
0	There is no information on the audit protocols used.
1	There is brief detail on the audit protocols used.
2	There is detailed discussion of multiple audit protocols used.

“”

What to expect during an audit:

- Site inspection of all areas of the site and any employer-provided living quarters.
- Confidential worker interviews or surveys conducted without site management present.
- Review and analysis of site documents or licenses to assess workers’ age, contracts, compensation, working hours, and workplace conditions.
- Identification of past compliance issues and areas for improvement.
- Development of a corrective action plan.
- Review of remediation measures

Amazon, ‘Supply chain standards manual’[83]

2

Amazon

Consumer discretionary

“”

We engaged an independent third-party auditor, with global capability, to perform the audit which consisted of:

- an announced audit over two days at CBA [Commonwealth Bank of Australia] Supplier’s head office to review policies, procedures and personnel files including payroll and timesheet records for interviewed workers; and
- unannounced site audits, over three days, at four of our corporate workplaces in Sydney and Perth to conduct confidential worker interviews.

Thirty-one workers were interviewed overall representing almost 40% of the total workforce across the audited sites.

Commonwealth Bank of Australia, ‘2024 modern slavery and human trafficking statement’[84]

2

Commonwealth Bank of Australia

Financials

Question 33

Did the company include in its audit protocol any monitoring beyond tier one and/or did its supplier code of conduct include an expectation that monitoring is cascaded down the supply/service chain?

Corresponding standards

KTC 6.1

Rationale

Companies should ensure that their audit processes are replicated down their supply/service chain as the most vulnerable workers are often further down the chain.

Scoring

0	There is no statement that audits are conducted down the supply/service chain.
1	There is a commitment to auditing beyond tier one.

Question 34

Did the company ensure there is one or more grievance mechanism(s) (its own, third party or shared) available to all workers in its operations and the supply/service chain to raise human-rights-related concerns (including labour conditions) without retaliation?

Corresponding standards

BHRRC 3.8; KTC 5.3; S2G 35 (see also ETI)

Rationale

Enabling workers to report concerns is necessary for the identification of labour exploitation and the assessment of risk. These whistleblowing systems should be anonymous, in a language workers understand, and available to all workers in the operations and the supply/service chain.

Scoring

0	There may be a grievance mechanism, but it is not available to both direct operations and supply/service chain workers.
1	There is a grievance mechanism available to workers in the company's own operations and in supply/service chains.

Question 35

Did the company disclose the number of whistleblowing reports that were flagged for concern?

Corresponding standards

BHRRC 3.8; KTC 5.3; S2G 35 (see also ETI)

Rationale

An indicator of the effectiveness of grievance mechanisms is whether workers are using them to report concerns. Grievance mechanisms should be open to both employees in a company's direct operations and workers in supply/service chains. Reporting the number of whistleblowing reports flagged for concern relating to modern slavery and/or human rights issues also demonstrates that these reports are being actively managed.

Scoring

0	The number of whistleblowing reports has not been disclosed.
1	The number of whistleblowing reports has been disclosed.

Question 36

Did the company disclose finding modern slavery and/or indicators of modern slavery (e.g. the International Labour Office's 11 indicators of forced labour[85]) in its value chain this year?

Corresponding standards

UNGPs

Rationale

Not identifying cases of modern slavery does not necessarily demonstrate an effective approach. With 28 million people worldwide estimated to be trapped in forced labour, modern slavery is a prevalent human rights concern. It can occur in any country and in a wide variety of circumstances. Finding modern slavery demonstrates effective risk assessment and due diligence processes, whereas not finding cases may indicate weaknesses in the approach. Additionally, publicly disclosing these cases is best practice for transparency and accountability.

Scoring

Score	
0	A case has not been disclosed.
1	A case or suspected case has been disclosed, or the company has identified a widespread systemic challenge in a particular sector or geography that it is linked to.

Explanatory notes

- Although we recognise that some companies struggle to find modern slavery, this point cannot be scored without disclosing a case. It is not sufficient to say that there were no instances of modern slavery.
- A suspected case might be identified through the presence of more than one of the International Labour Office's 11 indicators of forced labour.

2

L'Oréal

Consumer staples

Cases of non-compliance identified during social audits of suppliers by topic

Topic	Needs continuous improvement	Needs immediate action	Zero tolerance	Total number of non-compliance cases	Relative weighting by topic
Wages and charges	148	229	0	377	17.70%
Forced labour	113	14	0	127	5.96%
Sexual harassment and bullying	62	0	0	62	2.91%

… Some of the non-compliance cases concerned the payment of recruitment fees by workers, mainly migrants. In the majority of cases, these workers paid the fees to cover the cost of medical tests. In some cases, amounts were paid in advance by the workers. L'Oréal has held discussions with the Suppliers concerned and has asked them to put in place an action plan to remedy the situation. This plan includes reimbursing the workers concerned and introducing preventive procedures in order to reduce the likelihood of such cases arising again in the future.

Follow-up audits have been scheduled to verify that the remedial measures have been carried out. The audits revealed that identity documents have been withheld by employers when they are not legally obliged to do so.

L'Oréal, '2024 universal registration document'[86]

3

Comcast

Communication services

In 2024, Sky audited 96 suppliers across 14 countries, compared to 129 suppliers audited in 2023. Through the audit program and Sky's Group Supply Chain and Sustainability team visits, indicators of forced labor were identified at three supplier sites supplying components to CPE [consumer product equipment] suppliers (Tier 2). These issues included recruitment fees paid by workers at the site, who were sourced and managed via recruitment agents. In response, Sky initiated an investigation and engaged suppliers to agree on a plan to repay workers who were subjected to recruitment fees.

Comcast, 'Statement on modern slavery and supply chain values'[87]

Identified Human Rights Issues	Number of Transactions
Forced Labor, Human Trafficking	6
Child Labor	3
Impact on Indigenous People's Rights and Communities	6
Involuntary Displacement	5
Issues Related to the Working Environment and Other Employee Rights	1
Total	**21**

Mitsubishi UFJ Financial Group, 'MUFG human rights report 2024'[88]

4

Mitsubishi UFJ Financial Group

Financials

Fix it

For this section, all information disclosed by the company in the public domain is eligible for consideration. However, companies must have disclosed a case of modern slavery (question 36) to be eligible to score for questions 38–42. The disclosed case may be in their direct operations, supply chains, service chains and/or downstream value chains.

Question 37

Does the company have a human rights policy which clearly states that it supports the UN Guiding Principles on Business and Human Rights and recognises its duty to respect human rights and provide access to remedy?

Corresponding standards

UNGPs

Rationale

The UN Guiding Principles on Business and Human Rights (UNGPs) are a 'set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations'.[89] They commit companies to supporting or enabling remedy for human rights abuses.

Scoring

0 There is not a human rights policy explicitly aligned with the UNGPs.

1 There is a human rights policy explicitly aligned with the UNGPs.

Question 38

Where violations were found, in the words of the UN Guiding Principles on Business and Human Rights, had the company disclosed whether it had caused, contributed to or been linked to an adverse human rights impact (modern slavery case)?

Corresponding standards

UNGPs

Rationale

The UN Guiding Principles on Business and Human Rights require businesses to disclose how they have been linked to adverse human rights impacts as part of their human rights due diligence. Recognising responsibility for cases of modern slavery is the first step towards meaningful remediation.

Scoring

Score	Description
0	The company has not discussed how its actions caused, contributed to or linked it to a case of modern slavery.
1	The company states that it recognises its responsibility for having caused, contributed to or been linked to a case of modern slavery.

1

Cisco Systems

Information technology

Where we have identified that we have contributed to an adverse human rights impact, we aim to provide access to remedy for affected individuals through legitimate processes. For example, when we find that workers are being forced to pay recruitment fees, Cisco works with involved parties, from the supplier to the affected workers, and leverages industry partnerships to help facilitate the repayment of fees to workers.

Cisco Systems, 'Supply chain sustainability'[90]

Question 39

Where violations were found, had the company disclosed the steps taken to end and mitigate ongoing risks?

Corresponding standards

UNGPs

Rationale

Remediation plays a pivotal role in addressing modern slavery by directly addressing those who have been impacted. Where violations have been found, it is vital to revise procedures to protect workers in the future.

Scoring

0 There is no description of the steps taken to end and mitigate ongoing modern slavery risks.

1 There is brief detail about the steps taken to end and mitigate ongoing modern slavery risks.

2 There is detailed discussion of the steps taken to end and mitigate ongoing modern slavery risks, including at least two of the following: the specific actions taken, the outcomes of the actions, a timeline of the case and how effectiveness was verified.

2

Tesla

Consumer discretionary

In 2024, through our deeper assessment, we identified areas of concern. Below are examples of these areas and how we mitigated them.

Supply chain	Areas of concern	Examples of Tesla implemented/initiated measures
Several	Excessive overtime	Suppliers created corrective action plans to reduce working hours and were re-assessed for improvement during follow-up closure audits
Several	Worker-paid recruitment fees	Since 2023, thousands of supplier workers have been reimbursed by their employers (Tesla's suppliers) based on Tesla's requirement for suppliers to implement the Employer Pays Principle [in 2024, 6,821 workers at Tesla's suppliers were reimbursed for recruitment fees]
Drive unit	Withholding of wages	Supplier-established procedure to no longer deduct from workers' wages costs including passport renewal fees, residential permits and labor agency monthly service fees
Battery	Retention of personal identity documents or passports	Tesla initiated an investigation for additional information, implementation of a corrective action plan, and raised expectations for changes in policy
Chassis and power electronics supply chain	Deception through unclear communications	Suppliers provided translated employment contracts and pay slips based on migrant workers' nationalities, so that migrant workers can understand their employment terms, entitlements, and wages calculations

Tesla, 'Tesla global modern slavery and child labor transparency statement'[91]

1

Nestlé

Consumer staples

Key progress

By the end of 2024, our Child Labour Monitoring and Remediation System (CLMRS) in the cocoa supply chain [had] supported 123,953 households, provided remediation and prevention actions for 96,580 children, and ensured that 26,857 children in the Côte d'Ivoire and Ghana were no longer engaging in potentially hazardous activities. …

Salient issue: child labour and access to education …

According to the International Labour Organization (ILO) a total of 160 million children are estimated to be in child labour around the world, 70% of which are estimated to be in agriculture and other industries characterised by informality, low levels of regulation, and high levels of manual labour. As a result, child labour can be a systemic risk in non-mechanised farming such as cocoa or coffee. …

Nestlé was the first company in the industry to introduce a … CLMRS and openly report on this.

The CLMRS operates in our cocoa supply chain in Côte d'Ivoire and Ghana, in collaboration with the International Cocoa Initiative. It has now been extended to our coffee supply chain in Côte d'Ivoire.

It is a leading tool to help us tackle child labour risks and provides remediation that directly supports children, their families, and communities. The majority of remediation activities centre around education, including building schools, distributing school kits, and facilitating registration in apprenticeship programs.

Nestlé, 'Modern slavery statement 2024 Australia & UK'[92]

Question 40

Did the company report outcomes of the remedy process for the victims?

Corresponding standards

KTC 7.2; UNGPRF C2

Rationale

Remediation should be centred on those that have experienced harm and tailored to their needs.

Scoring

Score	Description
0	There is no information about the outcome of remedy for survivors of forced labour and/or the reported actions focus on the company's relationship with its suppliers.
1	The outcomes of the remedy process for survivors of forced labour have been reported.

“ ”

In cases where our assessment findings determined that a factory employee paid recruitment or employment fees, we require those suppliers to immediately repay employees based on local law and Microsoft requirements. In FY24, Devices suppliers took immediate action and repaid $66,939 in recruitment fees to 2,216 supplier employees.

Microsoft, ‘FY24 Microsoft supply chain integrity statement’[93]

1

Microsoft

Information technology

Question 41

Did the company provide evidence that remedy was satisfactory to the victims or groups representing the victims?

Corresponding standards

KTC 7.2; UNGPRF C6

Rationale

Evidence that remedy was satisfactory demonstrates an effective remediation process focused on the needs of those affected.

Scoring

0 There is no evidence given that remedy was satisfactory to survivors of forced labour.

1 There is evidence that survivors were consulted on remedy and indicated that they were satisfied with the outcome.

“ ”

To ensure mutual agreement on reimbursement amounts, Cisco’s standard operating procedure also involves asking suppliers to have workers sign a letter acknowledging they understand why they’re being reimbursed, the amount, and that it includes all fees paid during the recruitment process. Cisco reviews these signed letters alongside further supporting evidence of repayment such as pay slips and bank transfer reports.

Cisco Systems, ‘Cisco statement on the prevention of modern slavery and human trafficking’[94]

1

Cisco Systems

Information technology

Question 42

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

Corresponding standards

IRBC p8; S2G 29

Rationale

Provision of remedy is often challenging because multiple companies may source from the supplier where modern slavery is occurring, or the issue may be widespread and pervasive across a sector. In this situation, companies should try to effect systemic change beyond the remedy for the specific people who have experienced forced labour in the cases disclosed.

Scoring

0 There is no information about how the company has tried to increase its leverage and effect systemic change.

1 There is evidence that the company is trying to increase its leverage and effect systemic change through industry collaboration and membership of initiatives working towards modern slavery remediation and prevention.

2 There is evidence that the company is trying to increase its leverage and effect systemic change through leading its own industry or public policy initiative working towards modern slavery remediation and prevention.

2

Coca-Cola Co

Consumer staples

The Coca-Cola Company is committed to respecting human rights and continues to work with a range of stakeholders to help improve working conditions in the India sugarcane farming sector. …

This year, we refreshed and expanded our collaboration with Solidaridad in India – which began in the state of Uttar Pradesh in 2016 and Maharashtra in 2022 – to introduce new health and safety and working condition measures at farms that supply the Maharashtra mills with which the Coca-Cola system contracts. … These measures include access to clean water, sanitation, shaded rest areas, ergonomic scythes, feminine hygiene products, and grievance mechanisms. We are also working with our partners to implement training for mill management and labor brokers to improve worker recruitment and labor conditions.

Additionally, we have further advanced a multi-year effort to help establish the Coalition for Responsible Sugar in India (CRSI), a multi-stakeholder group focused on driving improvements in working conditions and sustainable farming for the Indian sugarcane sector. … In January 2025, CRSI is expected to participate in the launch of a project to support migrant sugarcane farm workers at their districts of origin in advance of their migration to certain districts of Maharashtra. The project will aim to establish migration centers that provide pre-departure onboarding, worker rights education, first aid, health and safety training (including women's health), links to government programs, and training for entrepreneurship, as well as improved access to grievance mechanisms.

While we've made progress, we acknowledge that more work is needed, and we remain committed to collaborating with relevant stakeholders to drive positive change and create meaningful impacts on the ground in India.

Coca-Cola Co, 'Update on collective actions to advance working conditions for sugarcane workers in India'[95]

Prevent it

For this section, all information disclosed by the company in the public domain is eligible for consideration.

Question 43

Did the company have a corrective action process for its suppliers and potential actions taken in case of non-compliance, such as stop work notices, warning letters, supplementary training or policy revision?

Corresponding standards

BHRRC 5.6; KTC 7.1

Rationale

Terminating a supplier relationship over forced labour concerns often further jeopardises the workforce under the supplier and denies responsibility for remedy. A corrective action process is a good way to work constructively with suppliers to address the causes of labour issues.

Scoring

0	The company has not disclosed any information on a corrective action process.
1	There is a corrective action process that includes escalation procedures to be followed in the event of a case of modern slavery being identified.

3

Thermo Fisher Scientific

Health care

In all cases, where performance is deemed 'insufficient' or 'partial', corrective action plans are requested from suppliers to drive continuous improvement. Thermo Fisher monitors these suppliers to confirm that the corrective action plans are implemented, and suppliers are reassessed in twelve months' time. Suppliers who persistently refuse to participate or do not demonstrate continuous improvement are targeted for escalated engagement, potentially including a third-party, onsite audit.

Thermo Fisher Scientific, 'Human rights and modern slavery transparency statement 2024'[96]

Question 44

Did the company discuss a responsible exit strategy from a supplier relationship?

Corresponding standards

KTC 7.1.3

Rationale

Where a supplier will not engage constructively, exiting the relationship may be the only option. Where this is the case, companies should disclose the efforts made to ensure workers are not adversely affected by this decision.

Scoring

0 There is no information disclosed on a responsible exit strategy.

1 There is discussion of how the company would exit a supplier relationship in such a way as to mitigate the consequences for workers, and the company demonstrates an understanding that leaving a relationship might put workers at further risk.

> When issues are identified, our goal is to work with and coach the suppliers to bring their practices into compliance with our requirements as this is in the best interest of the workers. However, we will suspend or terminate our relationship with a supplier if the supplier is uncooperative or findings are not promptly addressed.

GE Aerospace, '2025 UK & Australia Modern Slavery Act statement'[97]

3

GE Aerospace

Industrials

> We are committed to carrying out a responsible supplier exit strategy. This means that, in the event that – for duly-grounded reasons – we decide to cease operations with a supplier, the relationship will be terminated in a committed manner. In doing so, we carry out a prior accompaniment and monitoring task, in order to attempt to curb the impact this may involve.

Inditex, 'Supply chain: management to transform the sector'[98]

2

Inditex

Consumer discretionary

Question 45

Had the company integrated the Employer Pays Principle into its recruitment practices?

Corresponding standards

EPP; KTC 4.2

Rationale

The Employer Pays Principle states that a worker should not have to pay for employment, *and* that the responsibility for recruitment fees falls to the employer. Companies should commit to this principle as a mechanism for responsible recruitment that protects migrant and temporary labour and show how they implement it in their recruitment practices.

Scoring

0	There is not an explicit commitment to the Employer Pays Principle.
1	There is an explicit commitment to the Employer Pays Principle or a statement to this effect.

Question 46

What evidence was there of responsible procurement practices to encourage or reward good labour practices?

Corresponding standards

None

Rationale

Responsible purchasing practices are processes enacted to ensure that a company is not putting suppliers under undue pressure through its commercial practices. Suppliers should be treated with respect and in a fair, reasonable way. Increased pressure on suppliers increases the likelihood that they will use forced labour.

Scoring

0	There is no evidence of responsible procurement practices.
1	There is a policy disclosure that sets out how the company's employees should treat its suppliers with respect and in a fair, reasonable way.
1	There is evidence of responsible procurement practices through either external accreditation or detailed discussion of the mechanisms and schemes implemented.
1	There is a specific mechanism for suppliers to anonymously give feedback to the company about purchasing practices and/or there is evidence that companies are surveying their suppliers' purchasing practices down the supply/service chain.

(3 points available)

PMI [Philip Morris International] aims to deliver a set of targets to improve the socioeconomic well-being of tobacco-farming communities, including:

1. 100 percent of contracted farmers supplying tobacco to PMI make a living income by 2025;
2. Zero child labour in our tobacco supply chain by 2025;
3. 100 percent of tobacco farmworkers paid at least the minimum legal wage by 2022.

With specific reference to such last aspiration, in 2023, PMI continued to monitor the wages of 100 percent of the contracted tobacco farmers who hire workers and confirmed retention of the aspiration, with 99.8 percent of farmers paid their workers at least the minimum wage.

Philip Morris International, 'Philip Morris UK modern slavery and human trafficking statement for 2023'[99]

Note: this example is good practice for evidencing responsible purchasing practices (the second point in this non-laddered question).

2

Philip Morris International

Consumer staples

7 day payment terms for small, local, and indigenous suppliers globally

This change benefits approximately 4000 supply partners across 31 countries, including in our key operating regions of Australia, Chile, the United States, Canada, Mexico, and Trinidad and Tobago.

BHP Group, 'New and existing suppliers'[100]

Note: this example is good practice for evidencing responsible purchasing practices (the second point in this non-laddered question).

1

BHP Group

Materials

In FY24, Costco partnered with Better Buying™, a nonprofit organization that focuses on leveraging data to strengthen supplier–buyer relationships and improve purchasing practices. On our behalf, Better Buying has solicited anonymous feedback from Costco suppliers on such topics as Costco's planning and forecasting, design and development, and payment and terms. This feedback will be valuable for Costco in considering how these practices can impact our suppliers and workers in the supply chain.

Costco Wholesale, 'Costco Wholesale UK Ltd. modern slavery statement'[101]

2

Costco Wholesale

Consumer staples

Question 47

Was there a board member or board committee tasked with oversight of the company's modern slavery policies?

Corresponding standards

BHRRC 2.2; KTC 1.3; S2G (see also ETI)

Rationale

Modern slavery risks are comprehensive and require coordination across the business. It is important to have buy-in at executive level to enable work throughout the business and to have board members accountable for forced labour.

Scoring

0 There is no disclosure of the board member or committee with oversight of modern slavery policies.

1 There is disclosure of the board or committee responsible for addressing modern slavery and/or broader related business and human rights concerns.

3

Siemens

Industrials

The Siemens Managing Board and the Siemens Sustainability Board (SSB) monitor Siemens' actions in relation to human rights. ...

The Managing Board of Siemens AG has appointed the Chief Compliance Officer as the Siemens Human Rights Officer. The Human Rights Officer reports to the Supervisory Board and Managing Board on a regular and ad hoc basis on issues concerning human rights.

Siemens, 'Sustainability report 2024'[102]

4

Allianz Group

Financials

Human rights fall under the responsibility of the Group Sustainability Board.

Established in 2012, the Group Sustainability Board is the highest governing body for sustainability-related issues. It meets at least quarterly and is responsible for ensuring sustainability integration across all business lines and core processes dealing with insurance and investment decisions. It also has oversight of human rights-related topics and associated stakeholder engagement. The Allianz Group Human Rights Officer monitors the effectiveness of the Group's human rights risk management system in own operations and supply chains and reports to the Group Sustainability Board and the Executive Board of the Allianz SE annually on human rights risks and mitigations.

Allianz Group, 'Sustainability integration framework version 6.0'[103]

Question 48

Did the company have a committee, team, programme or officer responsible for implementing its modern slavery policies and responding to violations?

Corresponding standards

BHRRC 2.2; KTC 1.3; S2G (see also ETI)

Rationale

Executive oversight is important. However, for there to be an effective modern slavery process, there need to be people responsible for the implementation of these policies. This question seeks to understand that a relevant person or team is in place to drive the work forward.

Scoring

0 There is no information on who is responsible for the implementation of the company's modern slavery approach, or authority is delegated to business units with no further detail.

1 There is a team or person who is primarily responsible for actioning the company's modern slavery approach.

The Duty of Vigilance Department coordinates the Group's vigilance policy, through which LVMH aims to identify, prevent and mitigate risks to human rights and fundamental freedoms, human health and safety, as well as the environment, at every stage in the value chains of Group business activities. …

The Duty of Vigilance Director provides regular updates about the actions of their department to the Sustainability & Governance Committee. …

In 2024, he appeared before the committee three times. …

A dedicated team was hired following the creation of this department. At this stage, the team consists of four full-time employees based in France and Italy, all reporting to the Duty of Vigilance Director.

LVMH Moet Hennessy Louis Vuitton, 'Fiscal year ended December 31, 2024: universal registration document'[104]

4

LVMH Moet Hennessy Louis Vuitton

Consumer discretionary

3

McDonald's

Consumer discretionary

McDonald's Corporation's Global People and Global Supply Chain functions are responsible for overarching human rights policies and performance. Human rights professionals on its Global Sustainability & Social Impact team play a key coordinating role and also manage a cross-functional Human Rights Working Group which meets quarterly, as well as on an ad hoc basis as needed. ...

All modern slavery related concerns raised ... are escalated internally to our newly established Modern Slavery Response Team ('MSR'), made up of colleagues with expertise in areas such as employment compliance and law. The MSR team reviews each case and, where appropriate, carries out investigations.

McDonald's, 'McDonald's Restaurants Limited (McDonald's UK): modern slavery statement for the 2024 financial year'[105]

Key

BHRRC	Business and Human Rights Resource Centre methodology for assessing transparency in the supply chain (TISC) statements[106]
EPP	Employer Pays Principle[107]
ETI	Ethical Trading Initiative's 'Access to remedy' guidance for companies[108]
Home Office guidance 2021	Home Office's 2021 guidance on transparency in supply chains in relation to the Modern Slavery Act[109]
IRBC	Sociaal-Economische Raad's paper on enabling remediation[110]
KTC	The KnowTheChain assessment methodology[111]
S2G	Stronger Together's 'Tackling modern slavery in global supply chains' toolkit[112]
UNGPs	UN Guiding Principles on Business and Human Rights[113]
UNGPRF	UN Guiding Principles Reporting Framework[114]

Endnotes

1 Global Commission on Modern Slavery & Human Trafficking (2025), 'No country is immune: working together to end modern slavery & human trafficking', online at www.modernslaverycommission.org/gcms_report_full_doc.pdf

2 United Nations Human Rights Office of the High Commissioner (2011), 'Guiding principles on business and human rights', online at www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

3 International Labour Organization (2022), 'Global estimates of modern slavery: forced labour and forced marriage', online at www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage

4 Modern Slavery Act 2015, online at www.legislation.gov.uk/ukpga/2015/30/contents

5 UK Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible

6 Joint Committee on Human Rights (2025), 'Forced labour in UK supply chains', online at https://committees.parliament.uk/publications/49011/documents/257592/default, p. 10.

7 UK Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible

8 UK Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible

9 United Nations Human Rights Office of the High Commissioner (2011), 'Guiding principles on business and human rights', online at www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

10 Modern Slavery Act 2015, online at www.legislation.gov.uk/ukpga/2015/30/contents; UK Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible

11 CCLA (2025), 'Find it, Fix it, Prevent it: modern slavery report 2024', online at www.ccla.co.uk/sustainability/initiatives/modern-slavery; Rathbones (2025), 'Votes against slavery', online at www.rathbones.com/en-gb/wealth-management/responsible-investment/votes-against-slavery

12 UK Government (2025), 'Modern Slavery Statement Registry', online at https://modern-slavery-statement-registry.service.gov.uk

13 Walk Free (2021), 'Global Slavery Index', online at www.walkfree.org/global-slavery-index

14 International Labour Organization (2024), 'Profits and poverty: the economics of forced labour', online at www.ilo.org/publications/major-publications/profits-and-poverty-economics-forced-labour

15 International Labour Organization (2024), 'Profits and poverty: the economics of forced labour', online at www.ilo.org/publications/major-publications/profits-and-poverty-economics-forced-labour

16 International Labour Organization (2024), 'Acting against forced labour: an assessment of investment requirements and economic benefits', online at www.ilo.org/publications/major-publications/acting-against-forced-labour-assessment-investment-requirements-and

17 Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting, online at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32022L2464

18 EFRAG (2025), 'ESRS workstreams' online at www.efrag.org/en/sustainability-reporting/esrs-workstreams

19 Directorate-General for Financial Stability, Financial Services and Capital Markets Union (2025), 'Omnibus I package: Commission simplifies rules on sustainability and EU investments, delivering over €6 billion in administrative relief', online at https://finance.ec.europa.eu/publications/omnibus-i-package-commission-simplifies-rules-sustainability-and-eu-investments-delivering-over-eu6_en

20 European Council (23 June 2025), 'Simplification: Council agrees position on sustainability reporting and due diligence requirements to boost EU competitiveness', online at www.consilium.europa.eu/en/press/press-releases/2025/06/23/simplification-council-agrees-position-on-sustainability-reporting-and-due-diligence-requirements-to-boost-eu-competitiveness

21 Reclaim Finance (14 February 2025), 'Businesses, finance, NGOs, and academics defend EU laws against Omnibus', online at https://reclaimfinance.org/site/en/2025/02/14/businesses-finance-ngos-and-academics-defend-eu-laws-against-omnibus

22 US Customs and Border Protection (2025), 'Uyghur Forced Labor Prevention Act statistics', online at www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics

23 US Customs and Border Protection (2025), 'Withhold release orders & findings dashboard', online at www.cbp.gov/newsroom/stats/trade/withhold-release-orders-findings-dashboard
24 American Presidency Project (14 March 2025), 'Remarks by the vice president in Bay City, Michigan' (speech by J.D. Vance), online at www.presidency.ucsb.edu/documents/remarks-the-vice-president-bay-city-michigan
25 White House (30 July 2025), 'Suspending duty-free de minimis treatment for all countries', online at www.whitehouse.gov/presidential-actions/2025/07/suspending-duty-free-de-minimis-treatment-for-all-countries
26 US Select Committee on CCP (2023), 'Interim findings from Shein & Temu forced labor investigation', online at https://chinaselectcommittee.house.gov/media/press-releases/select-committee-releases-interim-findings-shein-temu-forced-labor
27 Walk Free (2021), 'Global Slavery Index', online at www.walkfree.org/global-slavery-index
28 Walk Free (13 March 2025), 'Thailand to introduce mandatory supply chain due diligence law', online at www.walkfree.org/news/2025/thailand-to-introduce-mandatory-supply-chain-due-diligence-law
29 Business & Human Rights Resource Centre (11 September 2023), 'Japan: after govt. released non-binding BHR guidelines in 2022, almost 65% of major Japanese companies have implemented human rights policies', online at www.business-humanrights.org/en/latest-news/japan-report-finds-that-almost-65-of-major-japanese-companies-implemented-human-rights-policies-after-government-releases-non-binding-bhr-guidelines
30 Australian Anti-Slavery Commissioner (4 September 2025), 'Getting the balance right: proportionate due diligence to address modern slavery risk' (speech by Chris Evans), online at www.antislaverycommissioner.gov.au/news/getting-balance-right-proportionate-due-diligence-address-modern-slavery-risks
31 CCLA (2025), 'Find it, Fix it, Prevent it: modern slavery report 2024', online at www.ccla.co.uk/sustainability/initiatives/modern-slavery
32 Home Office (2021), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide#full-publication-update-history
33 Communication to CCLA, 13 November 2025.
34 Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible
35 Home Office (2021), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide#full-publication-update-history
36 Commodity Futures Trading Commission (2010), 'Dodd-Frank Act', online at www.cftc.gov/LawRegulation/DoddFrankAct/index.htm
37 United Nations Human Rights Office of the High Commissioner (2011), 'Guiding principles on business and human rights', online at www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
38 Transparentem (2025), 'Material risk, minimal response: how investment firms assess unethical labor recruitment', online at https://transparentem.org/wp-content/uploads/2025/11/Material-Risk-Minimal-Response.pdf
39 Transparentem (2025), 'Material risk, minimal response: how investment firms assess unethical labor recruitment', online at https://transparentem.org/wp-content/uploads/2025/11/Material-Risk-Minimal-Response.pdf
40 Communication to CCLA, November 2025.
41 Amsterdam & Partners (2024), 'Apple hit with criminal complaints in France and Belgium over "blood minerals" in supply chain', online at https://amsterdamandpartners.com/press-release-apple-hit-with-criminal-complaints-in-france-and-belgium-over-blood-minerals-in-supply-chain; Transparentem (2025), 'The price of work: a brief on widespread migrant worker recruitment fees in Taiwan's manufacturing sectors', online at https://transparentem.org/wp-content/uploads/2025/02/The-Price-of-Work-Migrant-Worker-Recruitment-Fees-in-Taiwans-Manufacturing-Sectors.pdf
42 Business & Human Rights Resource Centre (24 March 2025), 'KnowTheChain ICT benchmark 2025: supply chain traceability and transparency', online at www.business-humanrights.org/en/from-us/briefings/knowthechain-ict-benchmark-2025-supply-chain-traceability
43 China Labor Watch, 'Ten co-signatories recommend the Responsible Business Alliance (RBA) to enhance transparency, effective communication and accountability', online at https://chinalaborwatch.org/wp-content/uploads/2024/06/Letter-to-the-RBA-June-3.docx.pdf
44 Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible

45 Modern Slavery Act 2015, online at www.legislation.gov.uk/ukpga/2015/30/contents; UK Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible
46 CCLA (2025), 'Find it, Fix it, Prevent it: modern slavery report 2024', online at www.ccla.co.uk/sustainability/initiatives/modern-slavery; Rathbones (2025), 'Votes against slavery', online at www.rathbones.com/en-gb/wealth-management/responsible-investment/votes-against-slavery
47 UK Government (2025), 'Modern Slavery Statement Registry', online at https://modern-slavery-statement-registry.service.gov.uk
48 Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible
49 Modern Slavery Act 2015, online at www.legislation.gov.uk/ukpga/2015/30/contents
50 Home Office (2025), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible
51 Pfizer (2025), '2024 forced labor, child labor, human rights, and decent working conditions regulatory disclosures', online at https://cdn.pfizer.com/pfizercom/responsibility/workplace_responsibility/2025_Modern_Slavery_Statement_16JUN2025.pdf
52 Advanced Micro Devices (2025), '2024 AMD statement against modern slavery and human trafficking', online at www.amd.com/content/dam/amd/en/documents/corporate/cr/supply-chain-transparency.pdf
53 Novo Nordisk (2025), 'Modern slavery statement 2024', online at www.novonordisk.com/content/dam/nncorp/global/en/sustainable-business/pdfs/esg-portal/novo-nordisk-modern-slavery-statement-2024.pdf
54 Morgan Stanley (2025), 'Morgan Stanley modern slavery and human trafficking statement – financial year 2024', online at www.morganstanley.com/content/dam/msdotcom/en/about-us-governance/pdf/Modern_Slavery_2024_Statement.pdf
55 Sony Group (2025), 'Sony Group statement on slavery and human trafficking', online at www.sony.com/en/SonyInfo/csr/library/msa/sis4ug000000k11n-att/SonyGroup_UK_MSA-2025.pdf
56 BHP Group (2024), 'Modern slavery statement 2024', online at www.bhp.com/-/media/documents/investors/annual-reports/2024/240827_bhpmodernslaverystatement2024.pdf
57 GE Aerospace (2025), '2025 UK & Australia Modern Slavery Act statement', online at www.geaerospace.com/sites/default/files/uk_modern_slavery_act_statement.pdf
58 Bank of America (2025), 'Bank of America modern slavery statement', online at https://about.bankofamerica.com/content/dam/about/report-center/msas/modern-slavery-act-statement.pdf
59 Novartis (2025), 'Modern slavery statement 2024 – Australia, Canada, and United Kingdom', online at www.novartis.com/sites/novartis_com/files/modern-slavery-act-statement.pdf
60 Mastercard (2025), 'Mastercard modern slavery and human trafficking statement 2024', online at www.mastercard.co.uk/en-gb/vision/who-we-are/mastercard-modern-slavery-and-human-trafficking-statement.html
61 Alphabet (2025), '2024 statement against modern slavery', online at www.gstatic.com/gumdrop/sustainability/2024-google-statement-against-modern-slavery.pdf
62 Schneider Electric (2025), '2024 Schneider Electric modern slavery statement', online at https://download.schneider-electric.com/files?p_Doc_Ref=SE-Group-Modern-Slavery-2024&p_enDocType=Institutional+Document&p_File_Name=2024+Schneider+Electric+Modern+Slavery+Statement.pdf
63 Commonwealth Bank of Australia (2024), '2024 modern slavery and human trafficking statement', online at www.commbank.com.au/content/dam/commbank-assets/about-us/docs/2024-Modern-Slavery-Statement.pdf
64 Costco Wholesale (2025), 'Costco Wholesale UK Ltd. modern slavery statement', online at www.costco.co.uk/mediapermalink/FY23-UK-Modern-Slavery-Statement
65 Samsung Electronics (2025), 'Samsung Electronics sustainability report 2025', online at www.samsung.com/global/sustainability/media/pdf/Samsung_Electronics_Sustainability_Report_2025_ENG.pdf
66 AT&T (2025), 'Responsible supply chain', online at https://sustainability.att.com/priority-topics/responsible-supply-chain
67 S&P Global (2024), 'S&P Global list of sub processors', online at www.spglobal.com/en/legal/list-of-sub-processors

68 Nestlé (2024), 'Nestlé supply chain disclosure: sugar', online at www.nestle.com/sites/default/files/2019-07/supply-chain-sugar-disclosure-upstream.pdf
69 Walt Disney Co (2025), 'UK modern slavery statement 2024', online at https://impact.disney.com/app/uploads/2025/06/2024-UK-Modern-Slavery-Statement.pdf
70 Cisco Systems (2025), 'Cisco statement on the prevention of modern slavery and human trafficking', online at www.cisco.com/c/dam/en_us/about/supply-chain/cisco-modern-slavery-statement.pdf
71 Tesla (2025), 'Tesla global modern slavery and child labor transparency statement', online at https://digitalassets.tesla.com/tesla-contents/image/upload/2024-modern-slavery-act-transparency-statement-GB.pdf
72 TotalEnergies (2024), 'Human rights briefing paper 2018–2023', online at https://totalenergies.com/system/files/documents/2024-01/HRBP_2024_en.pdf
73 Apple (2025), 'People and environment in our supply chain: 2025 annual progress report', online at https://s203.q4cdn.com/367071867/files/doc_downloads/2025/04/Apple-Supply-Chain-2025-Progress-Report.pdf
74 Novo Nordisk (2024), 'Responsible sourcing standard', online at www.novonordisk.com/content/dam/nncorp/global/en/contact/pdfs/2024-responsible-sourcing-standards.pdf
75 Meta Platforms (2025), 'Anti-slavery and human trafficking statement 2025', online at https://s21.q4cdn.com/399680738/files/doc_downloads/2025/05/2025-anti-slavery-human-trafficking-statement-v2.pdf
76 TotalEnergies (2025), 'Universal registration document 2024', online at https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf
77 Shift (2015), 'UN Guiding Principles Reporting Framework', online at www.ungpreporting.org/resources/salient-human-rights-issues
78 PepsiCo (2025), 'Modern slavery & human trafficking statement 2024', online at www.pepsico.co.uk/docs/unitedkingdomlibraries/modern-slavery-and-human-trafficking/2024-pepsico-modern-slavery-and-human-trafficking-statement.pdf
79 PepsiCo (2022), 'PepsiCo salient human rights issues update', online at https://edge.sitecorecloud.io/pepsico-5v9wci20/media/Files/esg-topics/2022-PepsiCo-Salient-Human-Rights-Issues-Update.pdf
80 Airbus (2025), 'Airbus SE modern slavery statement', online at www.airbus.com/sites/g/files/jlcbta136/files/2025-05/Airbus-SE-Modern-Slavery-Statement-2024.pdf
81 Roche Holding (2025), 'Annual report 2024', online at https://assets.roche.com/f/176343/x/09457b2a19/ar24e.pdf
82 Philip Morris International (2024), 'Philip Morris UK modern slavery and human trafficking statement for 2023', online at www.pmi.com/resources/docs/default-source/uk-market/pml-2023-modern-slavery-statement.pdf
83 Amazon (2024), 'Supply chain standards manual', online at https://sustainability.aboutamazon.com/amazon-supplier-manual-english.pdf
84 Commonwealth Bank of Australia (2024), '2024 modern slavery and human trafficking statement', online at www.commbank.com.au/content/dam/commbank-assets/about-us/docs/2024-Modern-Slavery-Statement.pdf
85 International Labour Office (2013), 'ILO indicators of forced labour', online at https://webapps.ilo.org/public/libdoc/ilo/2013/113B09_11_engl.pdf
86 L'Oréal (2025), '2024 universal registration document', online at www.loreal-finance.com/system/files/2025-03/LOREAL_DEU_2024_UK.pdf
87 Comcast (2025), 'Statement on modern slavery and supply chain values', online at www.cmcsa.com/static-files/54c68e1c-f4fd-425f-bb17-d8eec63e405e
88 Mitsubishi UFJ Financial Group (2024), 'MUFG human rights report 2024', online at www.mufg.jp/dam/csr/report/humanrights/2024_en.pdf
89 UN Working Group on Business and Human Rights (2011), 'The UN Guiding Principles on Business and Human Rights: an introduction', online at www.ohchr.org/sites/default/files/Documents/Issues/Business/Intro_Guiding_PrinciplesBusinessHR.pdf
90 Cisco Systems (2025), 'Supply chain sustainability', online at www.cisco.com/c/m/en_us/about/csr/esg-hub/supply-chain/sustainability.html
91 Tesla (2025), 'Tesla global modern slavery and child labor transparency statement', online at https://digitalassets.tesla.com/tesla-contents/image/upload/2024-modern-slavery-act-transparency-statement-GB.pdf
92 Nestlé (2025), 'Modern slavery statement 2024 Australia & UK', online at www.nestle.co.uk/sites/g/files/pydnoa461/files/2025-07/1386_Nestle_Modern_Slavery_Report_2024_FV_0.pdf
93 Microsoft (2025), 'FY24 Microsoft supply chain integrity statement', online at https://cdn-dynmedia-1.microsoft.com/is/content/microsoftcorp/microsoft/msc/documents/presentations/CSR/Microsoft-Supply-Chain-Integrity-Statement.pdf
94 Cisco Systems (2025), 'Cisco statement on the prevention of modern slavery and human trafficking', online at www.cisco.com/c/dam/en_us/about/supply-chain/cisco-modern-slavery-statement.pdf

95 Coca-Cola Co (20 December 2024), 'Update on collective actions to advance working conditions for sugarcane workers in India', online at www.coca-colacompany.com/media-center/update-on-collective-actions-to-advance-working-conditions-for-sugarcane-workers-in-india
96 Thermo Fisher Scientific (2025), 'Human rights and modern slavery transparency statement 2024', online at https://corporate.thermofisher.com/content/dam/tfcorpsite/documents/corporate-social-responsibility/2024-Human-Rights-Modern-Slavery-Statement(Signed).pdf
97 GE Aerospace (2025), '2025 UK & Australia Modern Slavery Act statement', online at www.geaerospace.com/sites/default/files/uk_modern_slavery_act_statement.pdf
98 Inditex (2024), 'Supply chain: management to transform the sector', online at www.inditex.com/itxcomweb/api/media/2f896a99-1b0f-4757-8242-3256e1701cee/Supply_chain_management_transform_sector.pdf?t=1748507834006
99 Philip Morris International (2024), 'Philip Morris UK modern slavery and human trafficking statement for 2023', online at www.pmi.com/resources/docs/default-source/uk-market/pml-2023-modern-slavery-statement.pdf
100 BHP Group (2025), 'New and existing suppliers', online at www.bhp.com/suppliers/new-and-existing-suppliers
101 Costco Wholesale (2025), 'Costco Wholesale UK Ltd. modern slavery statement', online at www.costco.co.uk/mediapermalink/FY23-UK-Modern-Slavery-Statement
102 Siemens (2025), 'Sustainability report 2024', online at https://assets.new.siemens.com/siemens/assets/api/uuid:32a7154d-edba-47bc-8e9b-9761617ba774/sustainability-report.pdf
103 Allianz Group (2024), 'Sustainability Integration Framework version 6.0', no longer available online.
104 LVMH Moet Hennessy Louis Vuitton (2025), 'Fiscal year ended December 31, 2024: universal registration document', online at https://lvmh-com.cdn.prismic.io/lvmh-com/Z-PY3HdAxsiBv6wN_UniversalRegistrationDocument2024.pdf
105 McDonald's (2025), 'McDonald's Restaurants Limited (McDonald's UK): modern slavery statement for the 2024 financial year', online at www.mcdonalds.com/gb/en-gb/terms-and-conditions/modern-slavery-act.html
106 Business & Human Rights Resource Centre (2021), 'Beyond compliance in the finance sector: a review of statements produced by asset managers under the UK Modern Slavery Act', online at www.business-humanrights.org/en/from-us/briefings/beyond-compliance-in-the-financial-sector-assessing-uk-modern-slavery-act-statements-produced-by-asset-managers
107 Institute for Human Rights and Business (2025), 'The Employer Pays Principle', online at www.ihrb.org/projects/employer-pays-principle
108 Ethical Trading Initiative (2019), 'Access to remedy: practical guidance for companies', online at www.ethicaltrade.org/sites/default/files/shared_resources/Access to remedy_0.pdf
109 Home Office (2021), 'Transparency in supply chains: a practical guide', online at www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide#full-publication-update-history
110 Sociaal-Economische Raad (2019), 'Working group enabling remediation', online at www.imvoconvenanten.nl/-/media/imvo/files/banking/paper-enabling-remediation.pdf
111 Business & Human Rights Resource Centre (2021), 'KnowTheChain', online at www.business-humanrights.org/en/from-us/knowthechain
112 Stronger Together (2025), 'Tackling modern slavery in global supply chains: a toolkit for business', online at www.stronger2gether.org with registration
113 United Nations Human Rights Office of the High Commissioner (2011), 'Guiding principles on business and human rights', online at www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
114 Shift and Mazars (2025), 'UN Guiding Principles Reporting Framework', online at www.ungpreporting.org/framework-guidance/download-the-reporting framework

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