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Organizational responses to modern slavery — Guidance



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Foreword

Publishing information

This British Standard is published by BSI Standards Limited, under licence from The British Standards Institution, and came into effect on 30 September 2022. It was prepared by subcommittee G/1/3, *Modern Slavery*, under the authority of Technical Committee G/1, *Governance*. A list of organizations represented on these committees can be obtained on request to their committee manager.

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Presentation conventions

The guidance in this standard is presented in roman (i.e. upright) type. Any recommendations are expressed in sentences in which the principal auxiliary verb is “should”.

Commentary, explanation and general informative material is presented in smaller italic type, and does not constitute a normative element.

Where words have alternative spellings, the preferred spelling of the Shorter Oxford English Dictionary is used (e.g. “organization” rather than “organisation”).

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0 Introduction

0.1 General

This British Standard provides organizations with guidance for managing modern slavery risk in its operations, supply chains and its wider operating environment. It uses a risk-based approach to help organizations understand the risk of modern slavery, to manage and reduce this risk as part of its legal and non-legal frameworks, and go beyond its legal and statutory duties. This risk management involves the systematic application of policies, procedures and practices to the activities of communicating and consulting, establishing the context and assessing, responding, monitoring, reviewing, recording and reporting the risk of modern slavery.

Modern slavery can be used to cover a set of specific legal concepts, including forced labour, debt bondage, forced marriage, slavery and slavery-like practices, and human trafficking. Modern slavery focuses attention on commonalities across these legal concepts and refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

NOTE 1 For further reading regarding why modern slavery is difficult to define, see [Change in Rhetoric but not in Action? Framing of the Ethical Issue of Modern Slavery in a UK Sector at High Risk of Labor Exploitation \[1\]](#).

Modern slavery practices sit at the extreme end of a continuum of exploitation, ranging from “decent work” to severe forms of labour exploitation, involving poor working and living conditions which harm human dignity. It is a criminal offence and a serious violation of people’s fundamental human and labour rights. The right not to be held in practices such as slavery, servitude and forced labour is echoed in core international frameworks, such as the UN *Guiding Principles on Business and Human Rights (UNGPs)* [2], the ILO *Declaration on Fundamental Principles and Rights at Work* [3] and, sustainable development goals (SDGs), including consideration of risks faced by humans as well as organizations.

NOTE 2 The International Labour Organization (ILO) defines “decent work” as the aspirations of people in their working lives, involving opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for families, better prospects for personal development and social integration, freedom for people to express their concerns, organize and participate in the decisions that affect their lives and equality of opportunity and treatment for all women and men.

Organizations can cause, contribute or be linked to modern slavery practices. Regardless of the type or size, all organizations have a responsibility to understand modern slavery risks to their business and whether they can be implicated as a result of their activities, products and services, and business relationships.

Recognizing that organizations can vary in their understanding and response to the risk of modern slavery and that they can have different degrees of resources and leverage, this British Standard needs to be complemented by cross-functional expert knowledge tailored to the nature and industry of the organization and associated risks. Modern slavery is more than an organizational risk, it is a risk to human rights such that decision-making around modern slavery needs to be people focused.

This British Standard recognizes the changing nature of modern slavery and related human rights legal instruments both on national and international levels. It does not intend to replace these frameworks. It is the organization’s responsibility to comply with relevant legislation.

While this British Standard focuses on modern slavery, it recognizes that there are interdependencies with other sustainability considerations, such as climate change. This link is explicitly laid out in the concept of “Just Transition”, which challenges businesses to put people at the heart of climate

mitigation and adaptation strategies. This British Standard has been constructed to complement that thinking.

NOTE 3 For further information on just transition, see the Paris Agreement 2015 [4].

This British Standard can be read in isolation; however, it has been written to allow organizations to integrate it into their system(s) or strategic approach to operational risks. It is intended to complement other activities that address the risk of modern slavery and related practices but not to replace them.

0.2 Modern slavery risk factors

Modern slavery practices can occur in any country or industry sector. However, there are some factors that can increase the risk of modern slavery, such as:

a) geography;

Countries or regions with poor labour market governance (e.g. restricted freedom of association and/or collective bargaining) or legal accountability for rights violations can present an elevated risk of modern slavery. Organizations need to take a risk-based approach to value chains reaching into territories in which these features are present.

b) labour market structure;

Countries, regions or sectors that are dominated by a single industry or a single or small number of employers can render workers more vulnerable as a result of a lack of employment choices.

Strong fluctuations in demand and supply for labour can increase modern slavery risks as the monitoring of workforce wellbeing, labour providers and recruitment channels become more challenging, and is often de-prioritized against the need for sufficient numbers of workers.

c) migration for work;

Low skilled work or poorly protected migrant workers can be at greater risk of modern slavery abuses. These can manifest themselves during the recruitment of workers in labour source countries and in their treatment at work in labour destination countries.

d) discrimination;

Discrimination based on ethnicity, gender, caste, tribal group, religion and other factors can make workers more vulnerable to modern slavery risk.

e) long and opaque value chains;

Highly complex global business models can lead to a lack of appropriate governance and oversight mechanisms and an elevated risk of modern slavery. Similarly, positive influence and/or leverage can be difficult to exert in business relationships, such as joint ventures.

f) corruption;

Corrupt business practices are often a root cause of modern slavery abuses.

g) vulnerable groups of people; and

There are particular individuals and groups that might be more at risk to modern slavery (see [0.3](#)).

h) supply chain volatility.

The relationships in the supply chain vary between industry sectors. Shorter-term, frequently changing, and project-based relationships with no longer-term engagement or repeat business make it more difficult to achieve transparency or ensure responsible behaviour throughout the supply chain. Furthermore, strong fluctuations in demand and supply lead organizations

to prioritize supply continuity and responsiveness over due diligence and compliance considerations. Ad-hoc and transactional relationships lower the ability to scrutinize and monitor potential modern slavery risks.

0.3 Vulnerable workers and groups

Certain groups might be more vulnerable to exploitation and modern slavery, including:

a) migrant workers;

While migrant workers are not inherently more vulnerable to modern slavery, factors such as migration status, language skills, knowledge of rights, and limited support and access to personal documents can contribute to their being at risk of modern slavery. Migrant workers who have limited access to basic necessities, such as accommodation and food can rely on their employer to provide these which contributes to their dependency and vulnerability.

b) women and marginalized workers;

Women and marginalized workers can be vulnerable to modern slavery due to harmful cultural practices, discrimination, marginalization, harassment, domestic and sexual violence, limited employment opportunities and poverty. These factors can increase the risk of exploitation and hinder the reporting of abuse or modern slavery practices in the workplace.

c) seasonal migrant workers;

Seasonal migrant workers in temporary migrant programmes can be at increased risk due to debt bondage (due to upfront migration costs and illegal recruitment fees), barriers to changing jobs, discrimination, lack of pathways to permanent residency and barriers to accessing justice. These workers are less likely to have access to social security nets, such as unemployment assistance.

d) precarious/informal workers;

Workers on precarious employment contracts, such as zero-hours contracts and dependent self-employment can experience a lack of guaranteed working hours. This creates insecurity and a higher risk of destitution.

e) young workers and children;

Young people aged between 15 to 18 years old in work can be vulnerable to physical, psychological or moral exploitation. Children in work under the age of 15, even when permitted by law, are particularly vulnerable to exploitation. They can often be more easily persuaded to lie about their age or working conditions to protect their income.

f) socially disadvantaged groups; and

Those who are socially excluded or in unstable social conditions can have limited economic opportunity and are typically more vulnerable. These groups can include those who are homeless, have disabilities or belong to a minoritized ethnic group.

g) workers operating in the informal economy.

Workers operating in any part of any economy that is neither taxed nor monitored by any form of government. Informal work can also often be found in domestic settings.

NOTE It is important to note that in some sectors and regions, men and women can be disproportionately affected, e.g. men are likely to make up a high proportion of modern slavery victims in the construction sector and women in domestic work or the textiles industry.

0.4 Factors influencing organizational responses to modern slavery

The motivations of organizations to identify and respond to modern slavery risks differ depending on the type of organization and the context in which they operate.

In addition to the organization's own values, drivers for addressing modern slavery include:

- a) legal and regulatory: compliance with modern slavery, labour and human rights standards; avoidance of financial and non-financial non-compliance costs; due diligence requirements and non-legal norms and mechanisms;
- b) investment: responding to investors' expectations (e.g. supporting responsible return on investment);
- c) customer pressure: responding to customer and consumer expectations (e.g. sourcing sustainable and ethical goods and services);
- d) stakeholder expectations: responding to increasing stakeholder expectations to take account of modern slavery risks; and
- e) positive business reputation: opportunity to differentiate itself in the marketplace by holding itself up to the highest standards.

1 Scope

This British Standard provides organizations with guidance for managing the risk of modern slavery, including prevention, identification, response, remediation, mitigation, and reporting modern slavery in its operations, supply chains and its wider operating environment.

NOTE This applies regardless of whether state authorities have established mechanisms to abolish and prohibit such practices.

This British Standard is applicable to all organizations, regardless of type, size and nature of activity.

2 Normative references

There are no normative references in this document.

3 Terms and definitions

For the purposes of this British Standard, the following terms and definitions apply.

3.1 bribery

offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties

NOTE The above is a generic definition. The meaning of the term "bribery" is as defined by the anti-bribery law applicable to the organization and by the anti-bribery management system designed by the organization.

[SOURCE: BS ISO 37001:2016, 3.1]

3.2 business associate

third party with whom the organization has, or plans to establish a business relationship

NOTE This includes any party whether a corporate body or an individual, including but not limited to franchisees, suppliers, outsourced services, partnerships, and purchasing agents who have a contractual relationship with the organization.

[SOURCE: BS ISO 37001:2016, 3.26]

3.3 child labour

work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development

NOTE The UN Convention on the Rights of the Child [3] stipulates that a child means every human being below the age of 18 years, unless under the law applicable to the child, majority is attained earlier. See also BS ISO 26000 and the International Labour Standards on Child labour [5].

3.4 compliance function

person or group of persons with responsibility and authority for the operation of the compliance management system

NOTE Preferably one individual is assigned to the oversight of the compliance management system.

3.5 compliance obligation

requirements that the organization mandatorily has to comply with as well as those that the organization voluntarily chooses to comply with

[SOURCE: BS ISO 37301:2021, 3.25]

NOTE Requirements can include laws and regulations, contracts, codes of practice and voluntary commitments like industry standard.

3.6 contractor

external party providing services to the organization in accordance with agreed specifications, terms and conditions

NOTE Services could include construction activities.

3.7 debt bondage

situation where people are forced to work for an employer to pay off their own debts or those they have inherited

NOTE 1 The victims, if they try to leave their employment, are usually caught and returned by force. Providing wages or other compensation to a worker does not necessarily indicate that the labour is not forced.

NOTE 2 Debt bondage is sometimes referred to by the term “bonded labour”.

NOTE 3 As defined by ILO Forced Labour Convention, 1930 (No. 29) [6].

3.8 downstream

handling, processing and movement of goods and services when no longer in the custody of the organization in the supply chain

[SOURCE: BS ISO 28001:2007, 3.10]

3.9 due diligence

ongoing risk management process to identify, prevent, mitigate and account for how adverse impacts are addressed in the organization and business associates

[SOURCE: United Nations Guiding Principles Reporting Framework [7], modified - definition amended]

NOTE The UN Guiding Principles on Business and Human Rights [5] stipulates that the main purpose of a human rights due diligence is the prevention of adverse impacts on people.

3.10 employee

worker in a direct labour relationship with the organization

3.11 forced labour

work or service exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily

NOTE See also BS ISO 26000, ILO Forced Labour Convention, 1930 (No. 29) [6] and the OECD Due Diligence Guidance for Responsible Business Conduct [8].

3.12 governing body

group or body that has the ultimate responsibility and authority for the organization's activities, governance and policies and to which top management reports and by which top management is held accountable

[SOURCE: BS ISO 37000:2021, 3.3.4]

3.13 human rights

basic entitlement and freedoms that belong to everyone, regardless of race, sex, nationality, ethnicity, language, religion, or any other status

NOTE Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more.

3.14 human trafficking

recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation

NOTE See United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime [9].

3.15 organization

person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives

NOTE 1 The concept of organization includes, but is not limited to, sole-trader, company, corporation, firm, enterprise, authority, partnership, charity or institution, or part or combination thereof, whether incorporated or not, public or private.

NOTE 2 If the organization is part of a larger entity, the term "organization" refers only to the part of the larger entity that is within the scope of the compliance management system.

[SOURCE: BS ISO 37000:2021, 3.1.3]

3.16 risk

effect of uncertainty on objectives

NOTE 1 An effect is a deviation from the expected. It can be positive, negative or both, and can address, create or result in opportunities and threats.

NOTE 2 Objectives can have different aspects and categories and can be applied at different levels.

NOTE 3 The UN Guiding Principles on Business and Human Rights [2] stipulate that risk needs to be understood in relation to people and not only to the organization itself.

[SOURCE: BS ISO 31000:2018, 3.1 modified – Notes amended.]

3.17 slavery

status or condition of a person over whom any or all the powers attaching to the right of ownership are exercised

NOTE 1 As legal ownership rights are no longer asserted by exploiters, powers attaching to the right of ownership need to be understood as constituting control over a person in such a way as to significantly deprive that person of their individual liberty, with the intent of exploitation through the use, management, profit, transfer or disposal of that person. Typically, this exercise is supported by and obtained through means such as violent force, deception and/or coercion.

NOTE 2 For further guidance, see Bellagio-Harvard Guidelines on the Legal Parameters of Slavery [10].

3.18 stakeholder

person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity

NOTE This constitutes one of the common terms and core definitions for ISO management system standards given in Annex SL of the Consolidated ISO Supplement to the ISO/IEC Directives, Part 1 [11].

3.19 subcontractor

organization or individual contracted by the supplier to perform a specific part of a contract

[SOURCE: BS ISO 20400:2017, 3.29]

3.20 supplier

organization that provides goods or services

[SOURCE: BS ISO 20400:2017, 3.30]

3.21 supply chain

direct and indirect relationship of organizations, people, processes, logistics, information, technology and resources engaged in activities and creating value from the sourcing of materials through the delivery of products or services, which can span across multiple tiers

[SOURCE: BS ISO 18788:2015, 3.71, modified – Notes amended]

NOTE 1 The supply chain might include vendors, subcontractors, manufacturing facilities, logistics providers, internal distribution centres, distributors, wholesalers and other entities that lead to the end user.

NOTE 2 See also value chain (3.23).

3.22 top management

person or group of people who directs and controls the organization at the highest level

3.23 upstream

handling, processing and moving of goods and services that occur before the organization in the supply chain takes custody of the goods

[SOURCE: BS ISO 28001:2007, 3.27]

3.24 value chain

process of value creation within a business model, across different types of assets from inputs, activities, outputs and outcomes

NOTE 1 Types of assets can include finance, raw materials, factored goods, human resource, IP and relationships.

NOTE 2 Value chains can also be highly connected to form value ribbons, e.g. the travel industry connects travel agents to airports to airlines to hotels.

3.25 victim

person(s) who is or was in situations of modern slavery

NOTE 1 Many people who experienced modern slavery prefer the term “survivor” to describe their self-identity in the process of regaining their freedom. This British Standard recognizes the individual self-identity of survivors which can vary between people throughout their liberation process and that how they choose to identify cannot be assumed by others. Therefore, the term victim (of modern slavery) is used throughout this British Standard.

NOTE 2 For further reading see, A Full Freedom: Contemporary Survivors’ Definitions of Slavery [12].

3.26 worker

person performing work or work-related activities that are under the control of the organization

NOTE 1 Persons perform work or work-related activities under various arrangements, paid or unpaid, such as regularly or temporarily, intermittently or seasonally, casually or on a part-time basis.

NOTE 2 Workers include top management, managerial and non-managerial persons.

NOTE 3 The work or work-related activities performed under the control of the organization could be performed by workers employed by the organization, workers of external providers, contractors, individuals, agency workers, and by other persons to the extent the organization shares control over their work or work-related activities, according to the context of the organization.

4 Context of the organization

4.1 Understanding the organization and its context

In managing the risk of modern slavery (as specified in [Clause 9](#)) the organization should understand and examine its external and internal context.

The organization should define and document the context in which it operates, including its supply chain, subcontractors and business associates. It is important to evaluate internal and external factors that can influence the way in which the organization assesses and mitigates modern slavery risk. This is important to feed into the organization’s overall modern slavery risk management process.

The external context refers to factors that are outside the organization but related to the management of modern slavery risk, including:

- a) the geographical locations in which the organization operates (such as its own activities; activities in its supply chain, subcontractors and business partners and activities, and products and services within the organization’s influence);
- b) the social, cultural, political, legal, regulatory and economic factors, whether international, national, regional or local;

- c) external stakeholders (such as businesses, civil society organizations, regulatory bodies, local government, the public, communities of interest, press and media, special interest groups, trade unions and employer organizations), and their expectations regarding the management of modern slavery risk;
- d) applicable market conditions related to the organization; and
- e) laws of the countries where the products/services provided are manufactured, distributed, supplied and consumed.

The internal context refers to factors that are substantially in the control of, or subject to the authority of, the organization through its governing and management systems. The organization should identify and evaluate its internal context, including objectives and strategies to mitigate modern slavery risks, which could include:

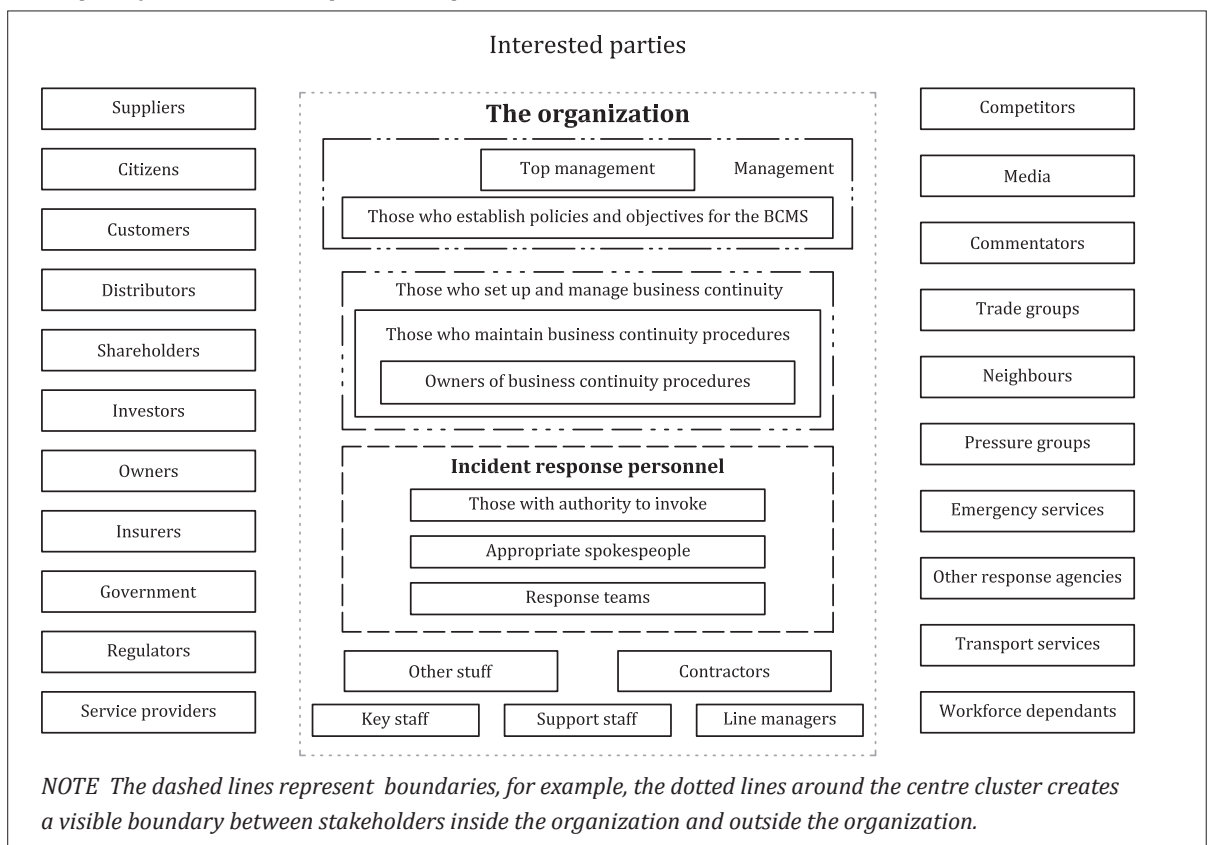
- 1) vision, mission and values;
- 2) governance, organizational structure, roles and accountabilities;
- 3) strategy, objectives and policies;
- 4) the organization's culture;
- 5) standards, guidelines, agreements and business models adopted by the organization;
- 6) capabilities, understood in terms of resources and knowledge (e.g. capital, time, people, processes and systems);
- 7) relationships with contractual and internal stakeholders, taking into account their perceptions and values;
- 8) interdependencies and interconnections;
- 9) the labour provision models being used (see [Annex A](#));
- 10) processes and practices used to procure goods and services;
- 11) supply chain management and governance of victim vulnerabilities and applicable financial processes relating to employment, especially seasonal (or similar) workers; and
- 12) the nature of the workforce and vulnerabilities associated with certain aspects or types of employment.

4.2 Understanding the needs and expectations of stakeholders

4.2.1 General

As part of the organization's duty of care within and outside the organization, it should identify all stakeholders that are of relevance to its modern slavery strategy and approach, taking account of their requirements based on needs and expectations. It is important to identify not only obligatory and stated requirements but also any that are implied.

NOTE See [Figure 1](#) for examples of stakeholders in public and private sectors.

Figure 1 — Examples of stakeholders in public and private sectors

4.2.2 Compliance, legal and regulatory requirements

The organization should identify its obligations and maintain its social licence to operate in all situations in which the organization (or its suppliers) operates, including where the law or its enforcement might not provide for minimum human rights safeguards. This applies to all situations in which the organization (or its suppliers) operates, including where the law or its enforcement might not provide for minimum human rights safeguards.

NOTE 1 Social licence represents an organization's ongoing acceptance of its own or the industry's standard business practices and operating procedures by its employees, stakeholders, and the general public.

NOTE 2 There are numerous international, regional and national initiatives driving organizations to act in an ethical and responsible manner, such as the UN Guiding Principles on Business and Human Rights (UNGPs) [2] and OECD Guidelines for Multinational Enterprises [13]. Additionally, several European states, such as France and Germany have passed laws requiring organizations to conduct mandatory due diligence and publicly report on the steps being taken to tackle modern slavery.

The organization's obligations include:

- legislation, UK and international;
- local government requirements;
- international frameworks (such as the UNGPs) and voluntary requirements (such as industry codes of conduct and due diligence standards, such as the *OECD Due Diligence Standard for Responsible Business conduct* [8]);
- agreements with community groups or non-governmental organizations and trade associations;
- public commitments of the organization or its parent organization; and
- contractual relationships and commitments.

4.2.3 Human rights, modern slavery and compliance

The organization should identify its human rights, modern slavery compliance obligations, determining, as a minimum:

- a) processes that take into account the organization's context and its significant modern slavery-related aspects and risks associated with its compliance obligations;
- b) whether legal, compliance and other requirements present risk;
- c) identifying (see [0.2](#) and [0.3](#)), monitoring and reporting significant modern slavery risk in its operations and supply chains;
- d) ranking modern slavery risks in order of priority;
- e) due diligence measures or corrective actions to mitigate compliance risks within an agreed timeline;
- f) publicly disclosing modern slavery risks and measures taken to mitigate them (e.g. in the organization's modern slavery statement and annual report);
- g) establishing contact points and regular communication between the organization and suppliers, subsidiaries, and other entities around changes in context or compliance risk; and
- h) incorporating modern slavery risk into the overall risk register.

4.3 Bribery

4.3.1 General

Modern slavery can be linked with bribery. Therefore, the organization should ensure any third party, over which it has control, either implements:

- a) the organization's anti-bribery management system; or
- b) its own anti-bribery controls.

In each case, it is only to the extent that is reasonable and proportionate with regard to the bribery risks faced by the controlled organization, taking into account that organization's risk assessment.

NOTE 1 The organization has control over another organization if it directly or indirectly controls the management of the organization.

In relation to business associates not controlled by the organization (such as suppliers and contractors) where the risk of bribery is assessed as being low, the organization should:

- 1) determine whether the business associate has anti-bribery controls in place; and
- 2) where a business associate does not have anti-bribery controls in place (or it is not possible to verify this), ensure the business associate implements anti-bribery controls in relation to the relevant transaction, project or activity. If this is not possible, this should be a factor in evaluating the bribery risk of the relationship with the business associate and the way in which the organization manages such risks.

For business associates which pose a moderate or high bribery risk, the organization should ensure that:

- i) business associates commit to preventing bribery by, on behalf of, or for the benefit of the business associate in connection with the relevant transaction, project, activity, or relationship; and
- ii) it is able to terminate the relationship with the business associate in the event of bribery by, on behalf of, or for the benefit of the business associate in connection with the relevant transaction, project, activity, or relationship.

Where it is not practicable to meet 1) or 2), this should be taken into account in evaluating the bribery risk of the relationship with this business associate and the way in which the organization manages such risks.

NOTE 2 For more information on anti-bribery and extortion, see BS ISO 37001.

4.3.2 Organizational compliance requirements

The organization should have policies and procedures in place to fulfil its compliance obligations, including to:

- a) determine how the obligations identified in b) to e) apply to the organization's structure, operations, and supply chain;
- b) understand both internal and external factors that could impact on the management of these issues to deliver its intended results;

NOTE One way to do this is through consulting within the organization, its suppliers, contracting partners and relevant stakeholders, such as investors, consumers, employees and workers.

- c) assign accountability to a director (or equivalent) to oversee the assembly of a team of cross-functional workers to assess compliance risks annually;
- d) maintain a central risk register (see [9.3.2.1](#)); and
- e) monitor new compliance and modern slavery risks and incorporate these into the risk register and contractual agreements.

4.4 Legal and compliance teams

The organization should identify the key workers responsible for managing and implementing its compliance obligations. It should also ensure that key workers within the organization understand their responsibilities. In larger organizations, it can be that legal counsel, along with compliance managers or the company secretary, have a key role in ensuring compliance obligations. In smaller organizations, the role of understanding compliance obligations can fall across a number of functions, such as human resources, occupational health and safety, finance directors, procurement and the ethical or sustainability managers.

The role of legal and compliance teams can include:

- a) ensuring that legal compliance and other obligations are met;
- b) helping to set the organization's ethical standards beyond what the law requires;
- c) ensuring the organization's terms and conditions of contract are reviewed and appropriate contract clauses are inserted to address the risk of modern slavery;
- d) ensuring that any tender documents are reviewed, and the appropriate modern slavery provisions are inserted;
- e) understanding how the organization addresses any default provisions in contract clauses where modern slavery has been uncovered;
- f) advising the board on the risk relating to human rights and modern slavery;
- g) ensuring an annual review is carried out, taking into account circumstances, including developments in legal and other requirements, related to its modern slavery policy;
- h) devise internal accountability for the management of compliance risks;
- i) identify and document mandatory obligations related to modern slavery mitigation;
- j) identify emerging modern slavery-related legislation applicable to its activities, products and services;