**TEMPLATE: MODERN SLAVERY POLICY**

MARCH 2023

ABOUT THIS TEMPLATE

This template has been developed by the Global Business Coalition Against Human Trafficking ([GBCAT](https://www.gbcat.org/)) for businesses who seek to adopt a company-wide policy and commitment to prevent and address risks of modern slavery in their business operations and supply chains.

It can be freely downloaded on the [GBCAT website](https://www.gbcat.org/) and used by corporate suppliers across any industries. This document offers an example of a comprehensive modern slavery policy and is subject to adaptation based on company context. Parts of this template can be incorporated into a broader policy on human rights.

This template should be accompanied by meaningful human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights ([UNGPs](https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights)). More guidance on how to address modern slavery risks can be found in GBCAT’s [**Corporate Supplier Toolkit**](https://www.gbcat.org/resources-for-suppliers)**.**

ABOUT GBCAT

[GBCAT](https://www.gbcat.org/) is a coalition of businesses committed to combating human trafficking in company operations and supply chains. GBCAT’s work is focused on survivor empowerment and employment, corporate supplier capacity building and providing resources and guidance for businesses to navigate the landscape of anti-slavery tools, trainings and organizations. BSR provides executive leadership and secretariat support for GBCAT.

For more information and to access GBCAT’s free supplier resources, visit the [GBCAT website](https://www.gbcat.org/).

[COMPANY] MODERN SLAVERY POLICY

OUR COMMITMENT

[Company] is committed to respecting human rights and prohibits any forms of modern slavery, including human trafficking and forced labor, in accordance with international standards. All [Company]’s policies and procedures must integrate and comply with this commitment.

Our commitment is guided by national legislation and international human rights standards including the [Universal Declaration of Human Rights](https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf), the International Bill of Rights (including the [Universal Declaration of Human Rights](https://www.un.org/en/about-us/universal-declaration-of-human-rights), the [International Covenant on Economic, Social and Cultural Rights](https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights), and the [International Covenant on Civil and Political Rights](https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights)), the [UN Guiding Principles on Business and Human Rights](https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights), the [United Nations Convention against Transnational Organized Crime](https://www.unodc.org/documents/treaties/UNTOC/Publications/TOC%20Convention/TOCebook-e.pdf), the [UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children](https://www.ohchr.org/sites/default/files/ProtocolonTrafficking.pdf), the [ILO Forced Labor Convention (C029)](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID,P12100_LANG_CODE:312174,fr) and [the ILO Worst Forms of Child Labor Convention (C182)](https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_INSTRUMENT_ID,P12100_LANG_CODE:312327,en:NO).

definition

[Company] understands:

* **Human trafficking (or trafficking in persons)** is the recruitment, transportation, transfer, harboring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit. It includes the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs.
* **Forced labor** is all work or service that is performed involuntarily and under the menace of any penalty.
* **Modern slavery** is an umbrella term used to cover slavery, servitude or compulsory forms and human trafficking, which are defined by several international standards.

SCOPE OF APPLICATION

This policy applies to any operations conducted under [Company] as well as to our partners, suppliers, contractors, customers or any party with whom we do business.

[Company] expects all its business partners to follow this policy and its principles. All business partners are equally responsible for implementing and monitoring the above principles, whether through the creation of an oversight working group or through the mainstreaming of relevant principles into existing departments.

PROHIBITED PRACTICES

[Company] prohibits practices which may constitute or lead to situations of modern slavery in business operations and supply chains, including (but not limited to):

* Charging candidates recruitment fees;
* Collaborating with recruiters who do not comply with local labor laws;
* Withholding employee identity or immigration documents;
* Restricting freedom of movement or employees’ right to terminate employment;
* Having direct control of, or access to, employees’ bank accounts other than to make direct deposits of compensation;
* Procuring commercial sex acts;
* Failing to provide an employment contract or work document which complies with local and international law;
* Coercing any employees to perform work or activities under the threat of penalty.

OUR APPROACH

[Company] will undertake human rights due diligence to identify, prevent and mitigate risks of modern slavery in line with the [UN Guiding Principles on Business and Human Rights](https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights). To do so, [Company] will take a number of actions:

* Integrate this policy in all relevant company policies and procedures, including [add relevant policies,] e.g., Human Rights Policy, Supplier Code of Conduct;
* Identify high-risk areas for slavery, including forced labor and human trafficking, directly or indirectly generated by our company operations and value chains through risk-based mappings and assessments, including Human Rights Assessments, in line with the UN Guiding Principles on Business and Human Rights framework;
* Identify the most vulnerable populations to exploitation across our company operations and supply chains. This might include giving special attention to women, young girls, children and those in conflict-affected areas;
* Establish relevant processes and integrate these into existing management systems to identify instances of modern slavery. For example, this may include verification of recruitment agencies’ legal status and worker interviewees to better understand the recruitment process;
* Engage with relevant stakeholders on the issue. For example, [Company] can provide training on forced labor to contractors and/or subcontractors that directly engage with vulnerable populations;
* Provide an anonymous grievance mechanism through which all stakeholders, including employees, third-party employees, suppliers and customers, can report concerns;
* Where violations are identified, work with relevant individuals or organizations (NGOs, for example) to address the situation and provide appropriate remedy. This may include using leverage with suppliers and engaging with external experts;
* Report on modern slavery risks to external stakeholders through an annual report and/or a modern slavery statement;
* Address forced labor and human trafficking as a systemic issue by funding human rights and sector-wide initiatives to address its root causes.

GOVERNANCE AND OVERSIGHT

Governance and supervision of our broader human rights work is ensured by [specify key functions / governance body]. [Function / governance body] is in charge of keeping all employees and partners accountable for eliminating human trafficking in all [Company]’s operations.

To do so, it identifies strategic measures, monitors progress and takes key decisions. The [Function / governance body] commits to continuously improve its approach to eradicating human trafficking based on learnings. The [key function / governance body] is overseen by the [highest level of authority e.g., Chief Executive Officer] and includes the [relevant positions], as well as representatives from [relevant stakeholder groups].

*Signature*

[Name]

[Role]

[Date]