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FTSE100 Failing to Meet Transparency Requirements

Modern Slavery Act

A recently published review of the FTSE 100's performance against the requirement under section 54 of the Modern Slavery Act 2015 (published here) finds that as many as 50% of assessed companies provided no meaningful information on whether their actions were effective in addressing modern slavery risks. This requires that businesses that supply goods or services in the UK (whether UK domiciled or not) and with a turnover of £36m or more worldwide publish a slavery and human trafficking statement annually. The statement should set out the steps the company has taken to ensure slavery and human trafficking is not taking place in any part of its business or supply chain. You can read more on Modern Slavery Act minimum transparency requirements here: [or otherwise contact the team contacts listed below for more information.](#)



MINIMUM REQUIREMENTS OF SLAVERY STATEMENT:

- ✓ indicate that it has been approved by the company board
- ✓ be signed by a director
- ✓ link to the statement on company website



RESULTS:



A GROWING CONCERN FOR COMPANIES:

A host of other jurisdictions - including **Canada, Australia, France and the Netherlands** - are contemplating following the UK's lead and introducing statutory reporting requirements in the future.



HOW WE CAN HELP



We can support you in assessing risk and demonstrating the effectiveness of that work by:

- **mapping supply chain risk** (extending to competition law, financial crime, employment, cyber and policy considerations if appropriate).
- **recommending best practice** and process in supply management with a view to pre-empting and minimising risk.
- **supporting effective implementation** of policies, procedures and training on these issues (whether via workshops, online training, regular alerts or other means).
- **leveraging the information collected** in assessing risk in order to extract maximum value - for example by modelling allocation of value and efficiencies across vertically integrated companies or informing strategies on crisis management and litigation risk.