Baker McKenzie.

modern slavery

responsible person
- Senior sponsor
- Responsible team
- Setting corporate tone
- Board approval
- Director's sign off

develop policies & practices
- Assess current practices
- Identify gaps from risk assessment
- Stakeholder involvement
- On-boarding
- Recruitment processes
- Use of agency staff
- KPIs

suppliers
- Procurement process
- Supplier selection and due diligence
- Supplier requirements
- Contractual clauses
- Monitoring and auditing
- Escalation process
- Remediation rights

remediation
- Ethics hotline
- Employee notices
- Trained investigators
- Investigation protocol
- Privilege
- Sanctions
- Regulatory disclosures
- Improvement plans
- Monitoring
- PR & crisis management

risk assessment
- Business & supply chain mapping
- Identify high risk countries
- Identify high risk businesses / transactions
- Identify high risk suppliers
- Audit

training
- Who to train
- Corporate priority
- Education about the issue
- Identifying high risks areas
- Spotting issues
- Company policy & good practice
- Procurement
- Supplier management
- Escalation processes

transparency statement
- Which entities are caught?
- Internal diligence
- Prepare statement
- Benchmark
- Board approval and director sign off
- Website requirements
- Internal / external communications
- Prepare PR team and other stakeholders

modern slavery compliance lifecycle