

BSI Supply Chain Slavery Gap Assessment

Recent media and non-government organization (NGO) attention have cast light on how prevalent human trafficking and slavery are around the world. Multinational companies with global supply chains who realize that their own operations may be supporting the practice often struggle to incorporate information and methods into their due diligence programs to tackle the issue. In addition, regulations such as the UK Modern Slavery Act and the California Transparency in Supply Chains Act have increased the urgency of establishing sound practices to support public disclosure requirements on the subject.

Client Global Footprint, Country Risks and Site Locations

This map presents the relative risk of countries in which the client operates, either directly or indirectly through its supply chain and business partners, according to the BSI Forced Labour Risk Index. Additional factors are illustrated in subsequent graphics, including the relative level of exposure of the client's sites/products, and controls that the client employs to manage those risks.

The BSI Forced Labour Index is calculated based on the following criteria:

- Regulatory Environment
- Consistency and effectiveness of enforcement
- Scale and frequency of incidence
- Presence of forced labour within export industries

Severe Risk



High Risk



Elevated Risk



21M

people subjected to forced labour globally

Guarded/Low Risk



"Organisations can be implicated in modern slavery both directly and indirectly in a variety of ways: in their own operations, through their global supply chains and through their involvement with business partners. Companies also risk employing exploited workers in the construction, maintenance and servicing of their facilities, particularly in cases where those functions are outsourced to third-party suppliers."

"It is not acceptable for any organisation to say, in the twenty-first century, that they did not know. It is not acceptable for organisations to ignore the issue because it is difficult or complex. And, it is certainly not acceptable for an organisation to put profit above the welfare and well-being of its employees and those working on its behalf."

Theresa May, UK Prime Minister

BSI Supply Chain Services and Solutions has responded by developing the BSI Supply Chain Slavery Gap Assessment. BSI's expertise and focus on the breadth of supply chain threats – human rights abuses, security threats, and business continuity risks – uniquely positions us to support our clients' needs in understanding and mitigating such a large-scale and complex issue.



...making excellence a habit.™

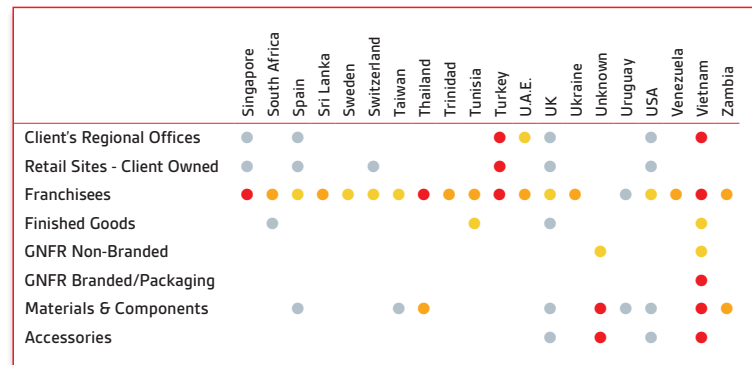
BSI leverages years of proprietary intelligence and analysis captured in our SCREEN platform, and pairs that with in-depth analysis of your company's practices and supply chain by our team of seasoned practitioners to provide objective feedback, prioritized risks and recommendations by assessing key risk criteria:

- **Exposure:** The level of vulnerability and visibility the client is likely to have based on the nature of the product, material, or worksite
- **Environment:** This focuses on factors related to the country in which a workplace operates, including its legal framework of labor law, enforcement capability and environment related to freedom of association and collective bargaining. This is represented by the BSI Forced Labor Index, which rates countries along a five-tier scale according to the criteria above, as well as historical incidence of cited threats.
- **Controls:** This focuses on the relative strength of controls employed by our client to identify and mitigate the risks to which the organization is exposed within the environments in which the organization directly or indirectly operates.

4. Client Franchisee Sites		Gap in Controls	Risk Level
4.1 Policies, Procedures & Process			
4.1.1	Presence of corporate policies regarding forced labor, overtime, hiring, recruitment and use of staffing agencies and contract labor/service providers	Major	●
4.1.2	Contractual language in franchisee agreements regarding forced labor, overtime, hiring, recruitment and use of staffing agencies and contract labor/service providers	Major	●
4.2 Communication & Information Flow			
4.2.1	Clear and consistent communication of policy requirements, ongoing changes to policies, for the client's staff	Minor	●
4.2.2	Clear and consistent communications of policy requirements, ongoing changes to policies, and grievance mechanisms to franchisee owners and staff	Minor	●
4.3 Skills & Training			
4.3.2	Training provided for managers & staff regarding hiring, workplace rights, forced labor, overtime, grievance mechanisms and risks related to staffing agencies and contract service providers	Major	●
4.4 Measurements			
4.4.1	Internal audit process, or another suitable means of measurement, to assess compliance with corporate policies related to hiring, forced labor, use of staffing agencies, etc.	Major	●
4.4.2	Measurements demonstrating effectiveness of grievance mechanism, examples of grievances, and history of complaint type/closure	Minor	●
4.5 Governance & Integration			
4.5.1	Executive-level visibility and ownership into management systems related to forced labor and workplace slavery risks	Major	●

The collaborative engagement and subsequent report identifies and prioritizes the relative risks, current controls employed by the organization, areas of strength, and gaps that represent areas of risk; allowing our clients to:

- Comply with disclosure requirements of the UK Modern Slavery Act, California Transparency in Supply Chains Act, and similar current/future regulatory requirements
- Identify high-risk and/or near-term forced/trafficked labor threats due to systems gaps that require immediate action; as well as gaps that require longer-term improvements to due diligence systems
- Identify opportunities to mitigate risk and drive improvement via improved visibility into organizational business practices, the supply chain and business partner activity.



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