

GLOBAL GOVERNANCE

Compliance and Conformance with U.K. MSA and Good Practice in Human Rights

FTSE 100 and Real Estate 100

October 2018



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ISBN: 978-3-9820398-0-0

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Title: GLOBAL GOVERNANCE – Compliance and Conformance with U.K. MSA and Good Practice in Human Rights: FTSE 100 and Real Estate 100

Published: October 2018

Executive Summary

With modern slavery a reality in global supply chains, in 2015 the United Kingdom (U.K.) passed the U.K. Modern Slavery Act (MSA). The term *modern slavery* designates a situation of exploitation in which a person cannot refuse or leave work because of threats, violence, coercion, abuse or deception. It includes slavery, servitude, forced labour, debt bondage, and deceptive recruiting for labour or services.

This report hones in on the Financial Times Stock Exchange (FTSE 100) and Real Estate (RE) 100, which represent the largest publicly traded companies in the U.K., and the largest real estate organisations by square foot, respectively. We choose to focus on these two cohorts, as their impact potential on the issue is especially high. The FTSE 100 had a combined net turnover of £1.7 trillion in 2017, and owned ca. 30,000 subsidiaries worldwide. Real estate companies are particularly vulnerable to modern slavery given the demand for unskilled, on-demand labour. Together, the Real Estate 100 owned 273 million square feet (25,352 square km) in London.

We assess each organisation's legal compliance, disclosure conformance and reported anti-slavery/anti-human trafficking (AS/AHT) good practice pursuant to Section 54 of the U.K. MSA:

1. Legal disclosure compliance (Dimension 1) is predicated on five reporting requirements;
2. Disclosure conformance (Dimension 2) concerns the six reporting topics advanced by the law;
3. AS/AHT good practice (Dimension 3) encompasses relevant AS/AHT measures organisations have instituted.

In the end, 167 organisations were included in the analysis, after excluding 31 public bodies, and two foreign governments (who are not required to report pursuant to the MSA) from the RE 100 set.

The findings show that basic *legal disclosure compliance* in the FTSE 100 cohort was generally mixed, with a mean score of 76.5%, and 60 companies earning a legal compliance score above the 70% mark (see *Table 1*). Ninety-seven (97) out of one hundred (100) FTSE 100 companies had a modern slavery statement. One-fourth (25) of these companies were deemed to be 100% compliant.

Table 1:

	FTSE 100 (n=100)		RE 100 (n=67)	
	average score	# over 70% score	average score	# over 70% score
Legal compliance	76.5%	60	42.1%	17
Disclosure conformance	59.6%	34	29.4%	4
AS/AHT good practice	25.5%	2	9.5%	1
<i>combined performance</i>	46.8%	7	22.6%	1

We note that 26 statements of the real estate cohort could not be located, although most had a website. A comparatively weaker performance was evident with regard to the RE 100's legal compliance, in which only 17 of organisations scored 70% and above, with a mean score of 42.1%.

Two companies' anti-slavery programme, proxied by *AS/AHT good practice*, scored the highest: Marks & Spencer Group Plc and Tesco Plc surpassed the 70% mark.

Combining these three dimensions into a bubble graph further illustrates that organisations performed better on legal compliance and disclosure conformance than AS/AHT good practice, the

size of the bubble indicating the number of organisations occupying that grade (see *Figure 1*). Seven companies scored above 70% in all three dimensions, indicating that they are well on their way of meeting both the letter and spirit of the law.

Figure 1: FTSE 100, compliance + conformance vs. AS/AHT good practice scores

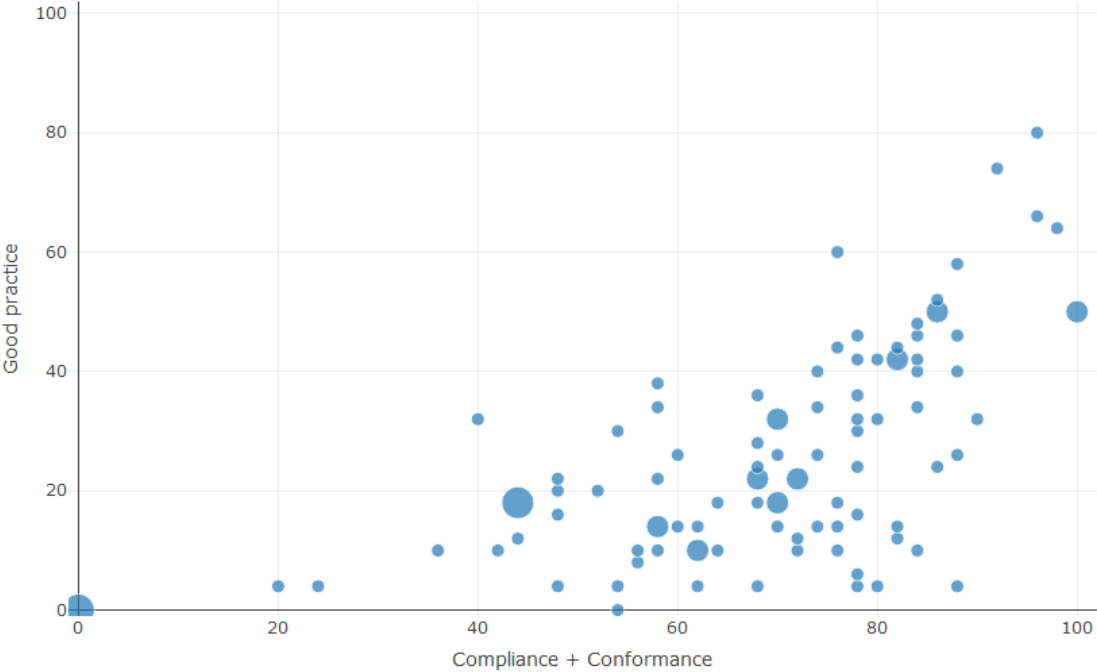
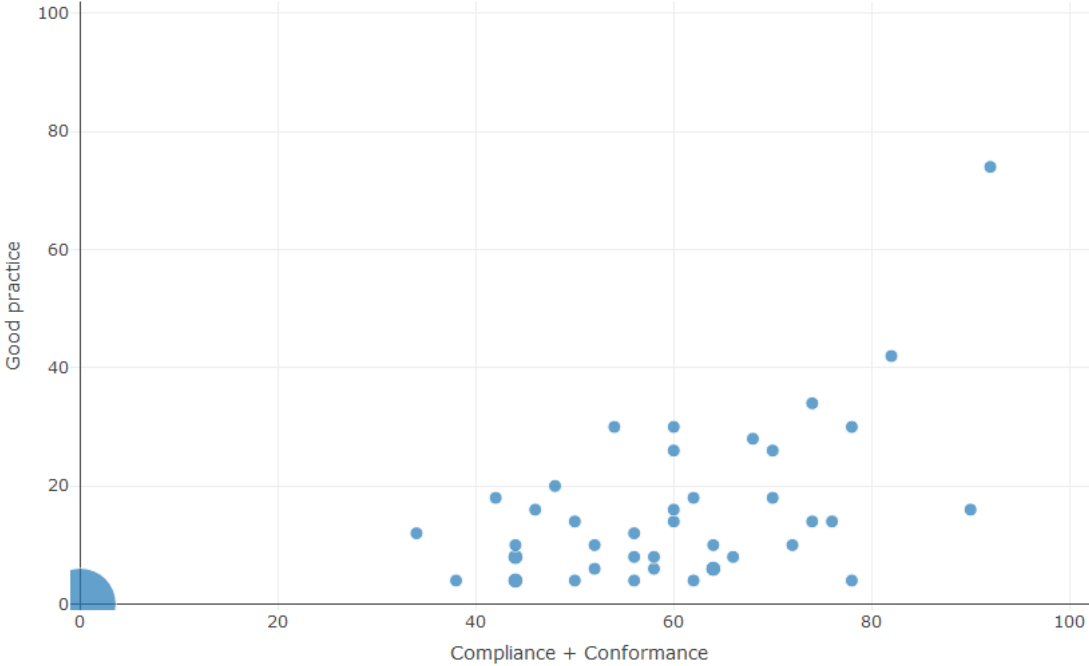


Figure 2: Real Estate 100, compliance + conformance vs. AS/AHT good practice scores



Individual scores are displayed in the [League Tables](#), where also scorecards are available. For a scorecard example see *Appendix D*.

Foreword

We are a few years on from the advent of the Modern Slavery Act (MSA) and the Transparency in Supply Chains clause in Section 54. Of the estimated 17,000 large companies with a turnover in excess of £36m who need to comply to the act a significant number have not produced a statement and a number of others have statements that are not legally compliant. Why have we therefore not seen a public outcry or indeed a policy response to this; has the MSA become a 'tiger without teeth' or is there something else we need to do?

These larger companies have been quick to realise that they will rely and need their smaller suppliers (many of whom fall under the threshold) in order to make genuine supply chain improvements. Procurement practices and partnership models will become increasingly part of the supply chain vernacular if we are to create the cultural change the industry needs to make to address and eradicate modern slavery.

The focus on the Modern Slavery statements is useful to a degree; the statements themselves are but a snapshot of a point in time when the organisation has summarised its view, risks and activities in relation to Modern Slavery; it can and indeed in many cases shows how the organisation is learning and considering new approaches as it matures its understanding of this complex issue.

We need to take a wider view of modern slavery and take into account how businesses and corporates behave ethically, and what systems they have in place to deal and adapt to ever changing risks and opportunities.

These league tables allow people to take a broader look into the corporate practices of each company on the list. Whilst the MSA statement is part of the disclosure it is not the overriding factor. So much feeds into the actions that allow the statement to be written; this methodology allows for greater transparency and provides a more holistic approach to understanding the ethical behaviour of the organisations listed. Some companies have already been verified to the Ethical Labour Sourcing Standard (ELS) which adopts a similar philosophy to the league tables.

The ELS is a verification standard developed by BRE which focusses on the continuous improvement shown by a company. The standard is based on a maturity profile across 12 issues in the standard which cover: organisational structure, Management Policies, Management Systems, Assurance, Compliance & auditing, Human Resources, Immigration, Procurement, Supply Chain Management, Bribery & Corruption, Learning & Development, Forums and Reporting. The standard specifies the requirements for organisational management to demonstrate an on-going commitment to the principles of ethical labour sourcing in relation to the provision of products and services.

The requirements of this BRE ELS Standard provide a framework against which all organisations may be assessed. The framework comprises criteria for evaluating the maturity of the performance of the organisation under the 12 aforementioned issues. The overall verification is not based on an aggregation of the levels of maturity in these issues but is based on a commitment to improve through an agreed set of at least five objectives.

Clearly there is no silver bullet to deal with modern slavery; it will take a range of initiatives, people and organisations to eradicate this abominable crime from society. Interventions like the ELS and the league tables raise the profile of those who are prepared to stand up and show they are making a conscious difference.

Dr Shamir Ghumra, C.Env, MIoD, FIEMA, BREEAM Director at BRE



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I. Introduction

This study assesses the anti-slavery performance as per the U.K. MSA on the part of the FTSE 100 and Real Estate 100.

A. U.K. MSA

Section 54 of the U.K. Modern Slavery Act requires all businesses that operate in the U.K., with a worldwide turnover of more than £36 million per year, regardless of size or footprint in the U.K., to report annually on the steps they took to address modern slavery in their supply chains and business practices, or to report that no such steps were taken.¹

The basic premise of the law is that the existence of forced labour in global value chains is an issue requiring transparency and remediation. Employing nudge theory coupled with sunlight-is-the-best-disinfectant logic, the law encourages companies to contemplate the steps they are, or are not taking, to address a scourge under which an estimated 24.9 million people suffer (excluding the forced marriage population).² To quote the then U.K. Home Secretary Theresa May: “*It is simply not acceptable for any organisation to say, in the twenty-first century, that they did not know.*”³

Since its passage, the Home Office has issued two guidance documents, the latest one – *Transparency in Supply Chains etc. A practical guide* – issued in 2017.⁴

B. FTSE 100

The Financial Times Stock Exchange 100 Index (FTSE 100), is a share index of the 100 companies listed on the London Stock Exchange with the highest market capitalisation – a combined £1.9 trillion as of September 2018.⁵ With ca. 30,000 subsidiaries worldwide,⁶ their sheer footprint and purchasing power translates into great potential for anti-slavery impact. Most of the FTSE 100 companies have long, complex, and diversified supply chains.

C. Real Estate 100

In addition to the risks that most businesses face in sourcing products and services globally, the construction, real estate and development sectors are some of the most vulnerable sectors to modern

¹ National Archives, *The Modern Slavery Act 2015*, Regulations 2015, 2015 No. 1816 (C. 113), Modern Slavery, <http://www.legislation.gov.U.K./U.K.si/2015/1816/made>

² International Labour Organization (ILO), Walk Free Foundation, International Organization for Migration, *Global estimates of modern slavery: Forced labour and forced marriage*, Geneva, 2017, https://www.alliance87.org/global_estimates_of_modern_slavery-forced_labour_and_forced_marriage.pdf

³ *Transparency in Supply Chains etc. A practical guide*, https://www.antislaverycommissioner.co.U.K./media/1061/transparency_in_supply_chains_etc_a_practical_guide_final_.pdf

⁴ *Transparency in Supply Chains etc. A practical guide*, 2017, https://www.gov.U.K./government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

⁵ London Stock Exchange Group, *FTSE Russell Factsheet*, 28 September 2018,

<https://www.ftse.com/Analytics/Factsheets/temp/96606bd6-032e-4dfc-aada-748263ba46d8.pdf>

⁶ 29,891 subsidiaries belonging to the FTSE 100 were identified in 2014, as per the Christian Aid-commissioned study. See: Christian Aid, *FTSEcrecy: the culture of concealment throughout the FTSE*, May 2014, <http://www.l4bb.org/reports/FTSEcrecy-report.pdf>

slavery given the nature and circumstances of the labour and in which the outsourcing model is generally practiced. This elevated risk is due to a number of factors including:

- high demand for low-skilled, manual, low-waged or migrant workers on temporary visas who often lack education (the industry employing approximately 7% of the global workforce)⁷;
- manufacturing materials used in the construction industry are at high risk for slavery in their production (including bricks, timber and rubber produced with forced labour and/or child labour in India, China and Brazil).

Yet, according to a 2016 survey conducted by the Achilles Group, 39% of construction businesses across the globe did not have a plan in place to find out who is in their supply chain.⁸ It was not uncommon for third party contractors or sub-contractors to be hired without express obligations concerning ethical recruitment/retention of labourers. Further problems arise when employers:

- withhold wages or force staff to work at rates lower than agreed;
- confiscate the passports of migrant workers;
- force workers to work under the threat of deportation;
- do not cover the recruitment fees, but allow recruiters to be paid from future wages;
- subject workers to unsafe or inadequate working conditions.

II. Methods

A. Data

The study's data comprised the subject organisations' official statements pursuant to the U.K. MSA. Data were collected in the month of August of 2018.

We assessed the statement that is currently accessible on the subject organisation's website. In the event that the statement could not be found on the company's website, we undertook a web search to identify a statement, also consulting the [TISCreport](#) and [Modern Slavery Registry](#) databases. If the web search however yielded no results, the company received a score of zero. For the purposes of this assessment, we only evaluated information provided in the statement, not taking into account information provided by linked documents or prior statements. Furthermore, we assessed the representations made by each company at face value.

The FTSE 100 list is provided by the London Stock Exchange,⁹ and the Real Estate 100 list was produced by Datscha, specifically ranking of the London's 100 largest commercial landlords by square footage owned.¹⁰ Data on each organisations' profiles (e.g. turnover, industry) were obtained from Bureau Van Dijk's Orbis database.¹¹ Both lists are reproduced in *Appendix B: Organisations Assessed*.

⁷ "The construction industry employs approximately 7% of the global work force and it is predicted to account for approximately 13% of GDP by 2020." See: Roel Nieuwenkamp, *The Global Construction Sector Needs a Big Push on Corporate Responsibility*, 22 August 2016, <http://oecdinsights.org/2016/08/22/global-construction-sector-corporate-responsibility/>

⁸ Achilles Group, *Construction businesses at risk due to suppliers*, Building Construction Design, 14 April 2016.

⁹ London Stock Exchange, *FTSE 100*, accessed September 10, 2018, <https://www.londonstockexchange.com/exchange/prices-and-markets/stocks/indices/summary/summary-indices-constituents.html?index=U.K.X>

¹⁰ As explained in their methodology, the "list has been compiled using data taken from the Land Registry, the Valuation Office and Companies House and includes all properties in the London region (NUTS 1). The list

B. Evaluation framework

This study's evaluation framework is based on the letter and spirit of the U.K. Modern Slavery Act of 2015. It also takes into account the Home Office's MSA Guidance (2017 edition),¹² as well as the practices currently deployed in the way of corporate anti-slavery/anti-human trafficking measures. As such, the evaluation framework is premised on DI's prior 2018 benchmarking,¹³ and captures the same three dimensions (see *Table 2*). *Appendix C: Evaluation Instrument* reproduces, in full, the set of indicators applied in this study.

Table 2: Three research dimensions

<i>dimension</i>	<i>indicator source</i>	<i># of indicators</i>	<i>weighting</i>
A. Legal disclosure compliance (Dimension 1)	← based solely on law's verbatim	9	25%
B. Disclosure conformance (Dimension 2)		14	25%
C. AS/AHT good practice (Dimension 3)	← premised on law ← based on survey of current AS/AHT practices applied	24	50%
<i>total</i>		47	100%

1. Legal disclosure compliance – Dimension 1: The compliance section related to the slavery and human trafficking statement concerns the mandatory disclose items as per the law and are drawn directly from the legislation (see *Table 3*). To be awarded full marks on this dimension, the organisation does not need to have an active anti-slavery/anti-human trafficking programme in place.

Table 3: Legal compliance criteria

1.	Link to statement on website homepage?
2.	Signed by director (corporations), designated member (LLP), or partner (partnerships)?

includes nominee companies (such as banks and financial advisers). The company names used in the table are the names of the legal entities registered with the Land Registry."

Property Week / Datscha, *Table: who owns London (ranked by sq ft)*, 21 March 2017, <https://www.propertyweek.com/data/table-who-owns-london-ranked-by-sq-ft/5088347.article>

¹¹ Bureau Van Dijk, *Orbis*, accessed September 2018, <https://www.bvdinfo.com/en-gb/our-products/data/international/orbis>

¹² Guidance issued by the U.K. Home Office pursuant to section 54(9) of the Modern Slavery Act 2015: *Transparency in Supply Chains etc. A practical guide*, 2017, https://www.gov.U.K./government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

¹³ Chris N. Bayer et al., *Corporate Compliance with the U.K. Modern Slavery Act – 2017/18*, Development International e.V., 18 April 2018, https://docs.wixstatic.com/ugd/f0f801_7cc00bb9d48b42639427f55809bbd955.pdf

3.	Approved by the board of directors or equivalent management body [except LLPs]?
	Explanation of steps organisation has or has not taken to ensure that slavery and human trafficking is not taking place: ¹⁴
4.	a) in any of its supply chains?
5.	b) in any part of its own business?
6.	Included a defined fiscal year period, which the contents of the statement are meant to cover?
7.	Complied with the annual publication requirement of MSA?
8.	Identify which individual company(ies) is/are covered under the statement?
9.	Made clear statement was pursuant to MSA?

2. Disclosure conformance – Dimension 2: The disclosure conformance section concerns the six topics recommended to be discussed as per Section 54 of the law:

- (5) *An organisation’s slavery and human trafficking statement may include information about—*
- (a) *the organisation’s structure, its business and its supply chains;*
 - (b) *its policies in relation to slavery and human trafficking;*
 - (c) *its due diligence processes in relation to slavery and human trafficking in its business and supply chains;*
 - (d) *the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;*
 - (e) *its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;*
 - (f) *the training about slavery and human trafficking available to its staff.*

The 2017 U.K. Home Office guidance¹⁵ explains this stipulation as follows: “A statement should aim to include information about ...”.

3. AS/AHT good practice – Dimension 3: The third dimension, *AS/AHT good practice*, benchmarks operational elements that comprise an organisation’s Anti-Slavery/Anti-Human Trafficking (AS/AHT) programme. Featured are 24 indicators, based on a review and identification of relevant practices reported by organisations under the U.K. MSA. These indicators fall under the following rubrics: policy,

¹⁴ “(4)A slavery and human trafficking statement for a financial year is—
(a)a statement of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place—
(i)in any of its supply chains, and
(ii)in any part of its own business, or
(b)a statement that the organisation has taken no such steps.”

U.K. Modern Slavery Act 2015, Section 54,
<http://www.legislation.gov.U.K./U.K.pga/2015/30/section/54/enacted>

¹⁵ U.K. Home Office, *Transparency in Supply Chains etc. A practical guide*, Guidance issued under section 54(9) of the Modern Slavery Act 2015, subsection 5.2, page 12.

value chain mapping, risk assessment, due diligence, audits, whistleblower channel / grievance mechanism, training, and effectiveness.

C. Scoring

An organisation's scores reflect the first 3 dimensions as specified above. High marks are achieved when the organisation not only has a quality AS/AHT programme in place, but also is able to describe it in sufficient detail in their U.K. MSA statement. For the sake of clarity, and to minimize subjectivity, binary yes/no criteria were applied to all indicators, and the indicators were formulated such that *Not Applicable* was not an option. While each dimension received a score, a combined score was also awarded. To do so, weighting was employed: each dimension received a specific weight: the legal compliance and disclosure conformance received 25% each, while the AS/AHT good practice dimension received 50% (see *Table 1*). As the assessment is centred around an organisation's ability to – as the law suggests – “ensure” that modern-day slavery is not taking place in one's value chains and business, for the purposes of the summary score the AS/AHT good practice dimension was weighted the most heavily. The weight of each indicator is noted in *Appendix C: Evaluation Instrument*.

D. Analyses

Binary yes/no data comprised the quantitative basis of the analysis. Descriptive statistics, in particular measures of central tendency, were applied. We also included industry-specific breakdowns for each dimension scored.

E. Research team, competing interests statement

The core research team consisted of attorney-evaluator Michael Margherita, ESQ, and Chris N. Bayer, PhD, who served as the study's Principal Investigator. The data were collected, and scores were awarded solely by the research team. The study's Principal Investigator and attorney-evaluator declare that they have no competing interests, nor conflict of interests, in their execution of this study. Neither DI nor the project team members provide any services to any of the due diligence programmes evaluated. In sum, they had no known vested interests vis-à-vis the individual scores and findings of this study.

F. Scorecards and data review requests

The scorecards and underpinning data evaluation sets are available to purchase on the [DI website](#). *Appendix D* provides an example scorecard of the first company on the list, ordered alphabetically. A data review option for individual organisations who disagree with – or have questions about – their scorecard is offered in the form of a [consultation](#). The consultation period shall take place throughout the month of November, 2018. In the event that DI would opt to make a score change, the consultation fee is reimbursed.

III. Findings

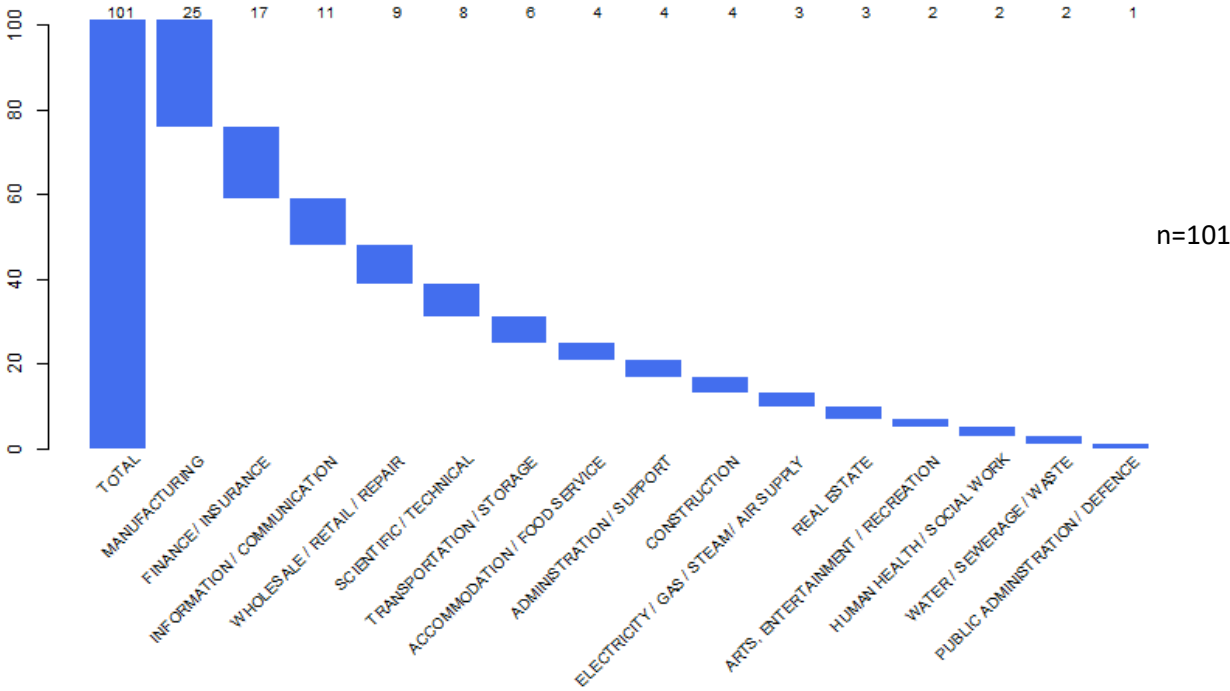
A. In-scope organisations

In-scope of this study were the 200 organisations: the FTSE 100 and Real Estate 100. Technically speaking, since Royal Dutch Shell Plc issues two stock classes (RDS'A' and RDS'B'), the FTSE 100 currently features 101 entities. We identified 97 MSA statements for the one hundred FTSE 100 companies.¹⁶ Of the Real Estate 100 organisations, 31 were public bodies and did not, to the best of our knowledge, meet the law's definition of "commercial organisation" or "business" (e.g.: 27. *The Mayor and Burgesses of the London Borough of Enfield*).¹⁷ Two entities on the list are foreign governments.¹⁸ All 67 remaining organisations featured on the Real Estate 100 list were assessed.

B. Profile of in-scope organisations

While the top 3 sectors in the FTSE 100 were manufacturing, finance/insurance, and information/communication (see *Figure 3*), the RE 100 companies were primarily in finance/insurance and real estate sectors (see *Figure 4*).

Figure 3: Industry sectors, FTSE 100

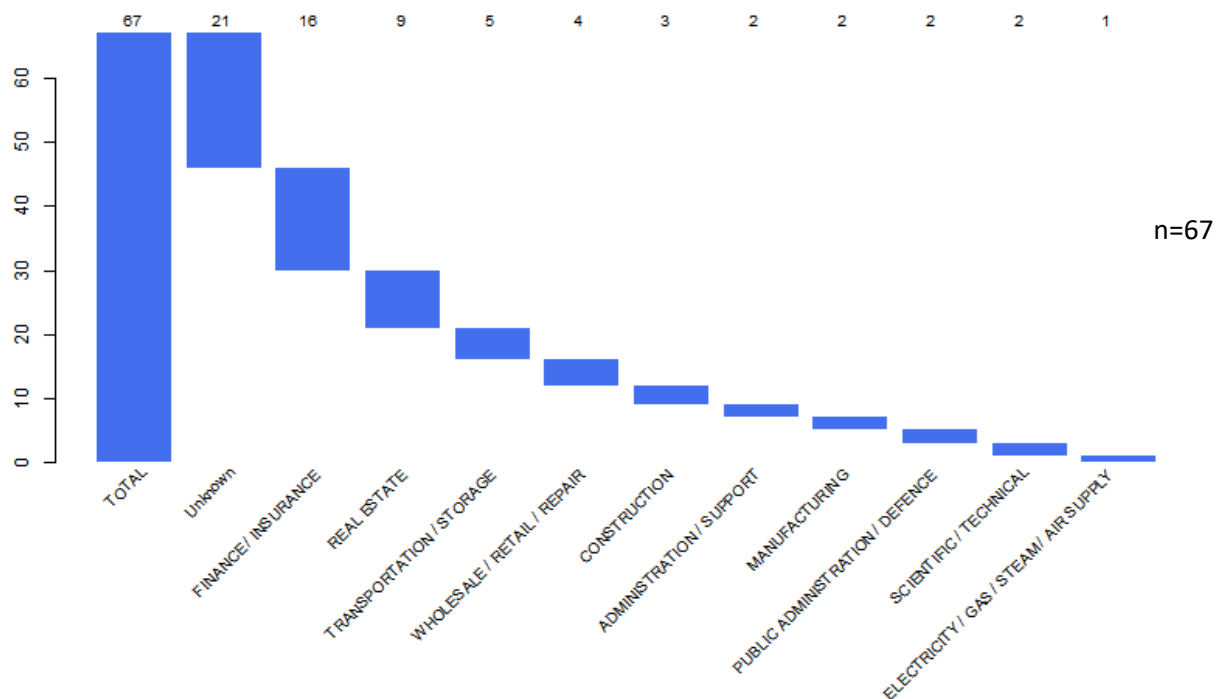


¹⁶ NMC Health Plc and Ashtead Group Public Limited Company both have a website, but a statement was not found. The Scottish Mortgage Investment Trust Plc, Company number SC007058, is managed by Baillie Gifford & Co Limited. The latter listed as the secretary of the former on the Companies House, appointed on 1 July 2014. A statement pursuant to the U.K. MSA for Scottish Mortgage Investment Trust Plc, or for Baillie Gifford & Co Limited, could not be found.

¹⁷ National Archives, *The Modern Slavery Act 2015*, Regulations 2015, 2015 No. 1816 (C. 113), Modern Slavery, <http://www.legislation.gov.U.K./U.K.si/2015/1816/made>

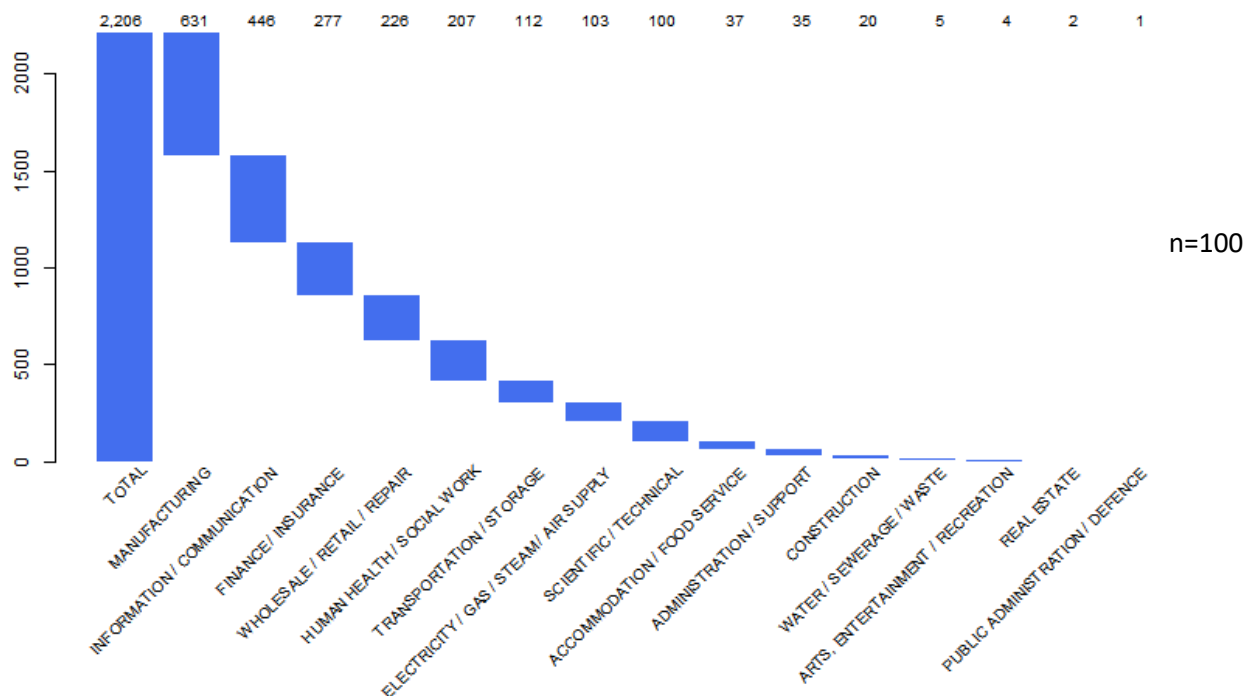
¹⁸ The Government of Qatar, managed by the Qatar Investment Authority and the Government of Kuwait, managed by the St Martins Management Corporation Limited.

Figure 4: Industry sectors, Real Estate 100



The FTSE 100-listed entities had a combined net market capitalisation of £1.9 trillion as of September 2018,¹⁹ and a global turnover of \$2.2 / £1.7 trillion in 2017 (see Figure 5).²⁰ The 35 organisations in the RE 100, for which data existed, had a turnover of \$317 billion / £246 billion in 2017 (see Figure 6).²¹

Figure 5: FTSE 100 turnover (\$) by industry sector, in billion

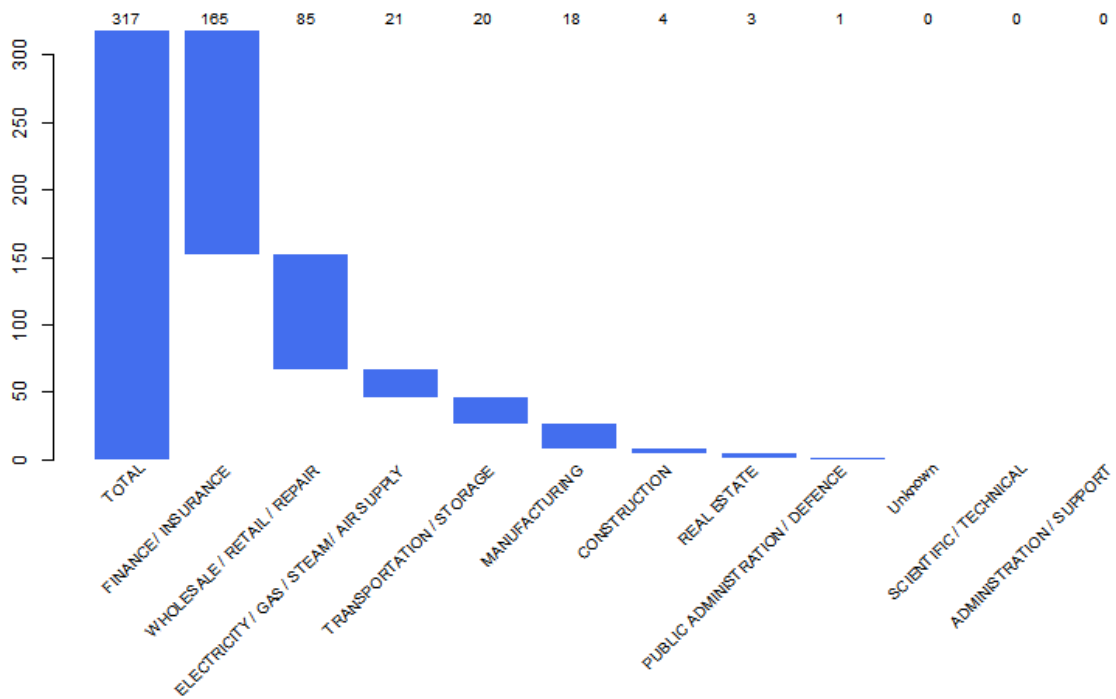


¹⁹ London Stock Exchange Group, *FTSE Russell Factsheet*, 28 September 2018, <https://www.ftse.com/Analytics/Factsheets/temp/96606bd6-032e-4dfc-aada-748263ba46d8.pdf>

²⁰ Using an annual average GBP to USD exchange rate of 0.776691.

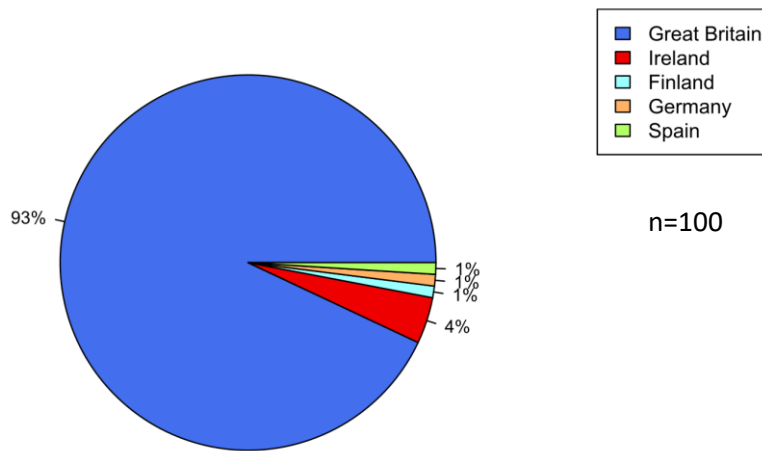
²¹ The £246 billion figure, however, certainly does not represent the turnover of the full RE 100 list, as 1/3rd of the RE 100 organisations on the list were excluded, and for another 32 no financial data was obtained.

Figure 6: RE 100 turnover (\$) by industry sector, in billion



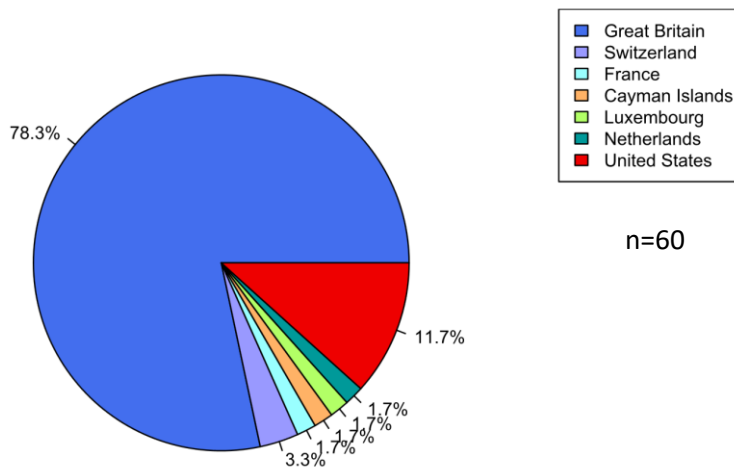
n=35

Figure 7: FTSE 100, country of operator headquarters



n=100

Figure 8: RE 100, country of operator headquarters



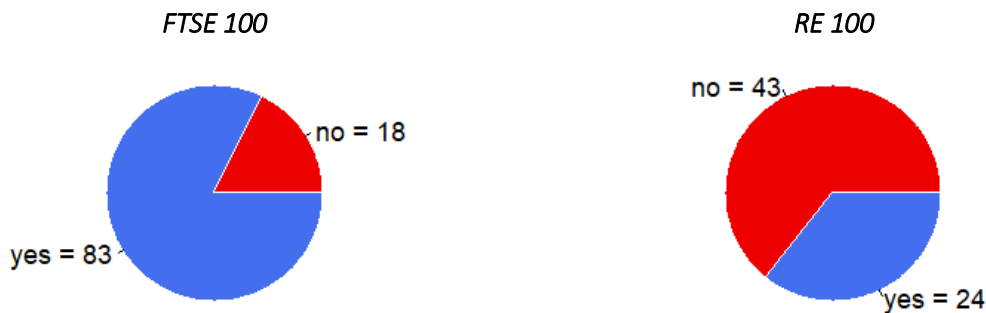
n=60

C. Legal disclosure compliance

The compliance section concerns nine (9) must-do items concerning the slavery and human trafficking statement that are drawn directly from the legislation (see *Table 3*). To be awarded full marks on this dimension, the organisation does not need to have an active anti-slavery/anti-human trafficking programme in place. In other words, all points may be earned in the legal compliance section even when the company has taken no steps against modern slavery.

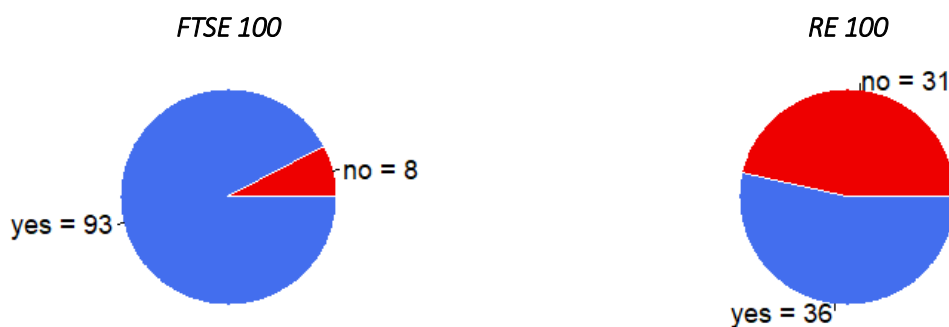
1. Link to statement on website homepage

The organisation must provide a URL to their current MSA statement on their homepage to earn this point. The link should be conspicuous as the MSA envisions that statements will be easily accessible to the general public.



2. Signed by director (corporations), designated member (LLP), or partner (partnerships)?

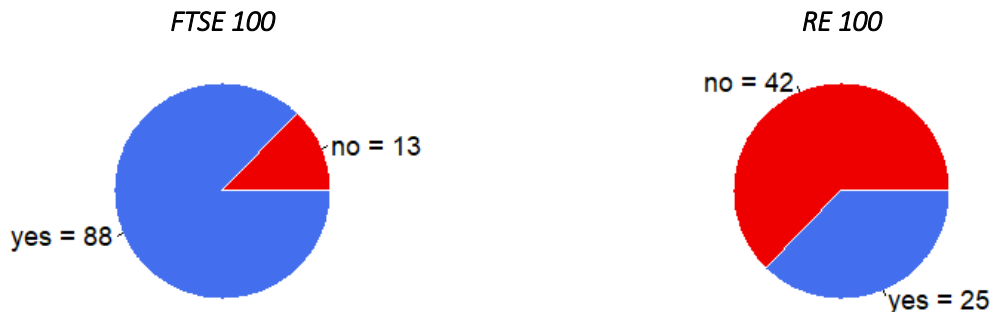
The signature requirement “would ensure,” according to the law’s 2017 guidance, “that these statements have appropriate support and approval from senior management, who are best placed to implement changes in the business.”²² Points are earned if the signature uniquely identifies the signatory party and the statement is otherwise signed in accordance with the 2017 Guidance. A handwritten signature and inclusion of the date signed are preferred.



²² U.K. Home Office, *Transparency in Supply Chains etc. – A practical guide*, [https://www.gov.U.K./government/uploads/system/uploads/attachment_data/file/471996/Transparency in Supply Chains etc. A practical guide final .pdf](https://www.gov.U.K./government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc_A_practical_guide_final_.pdf)

3. Approved by the board of directors or equivalent management body [except LLPs]?

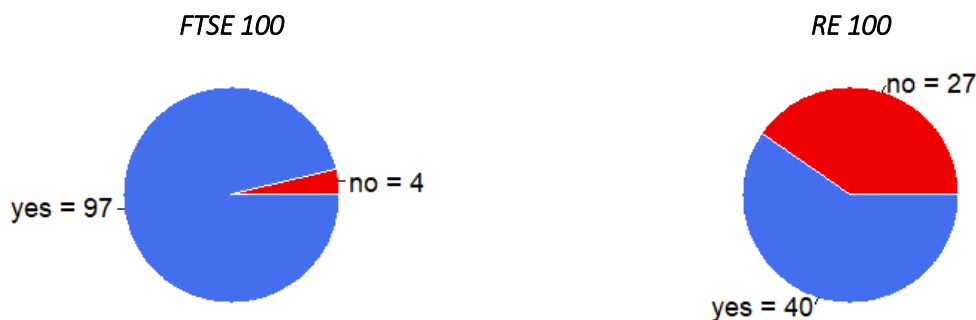
The MSA requires that the statement be approved by the organisation's board of directors to ensure that those individuals are apprised of the organisation's actions regarding modern slavery. As some organisations, e.g. certain real estate companies, do not have a board of directors, points were awarded when an equivalent management body approved the statement.



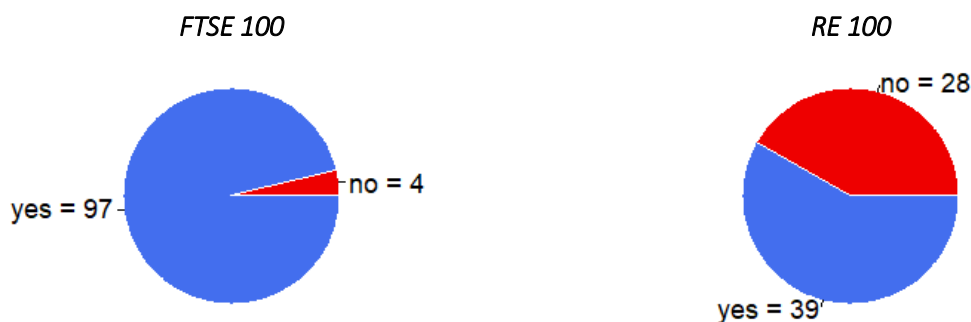
Explanation of steps organisation has or has not taken to ensure that slavery and human trafficking is not taking place.

4. (a) in any of its supply chains?

The MSA requires organisations to report on anti-slavery measures, or state the absence thereof. The law also differentiates between supply chains and own business operations. Both steps in its own business as well as in its value chains must be discussed. Alternatively, the organisation must explicitly acknowledge inaction. Organisations need not have taken steps to earn the point. This description also applies to 5.(b) below.

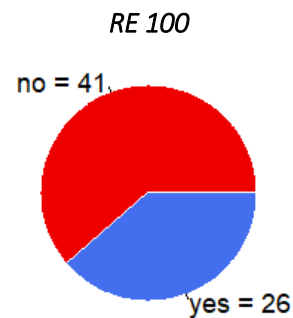
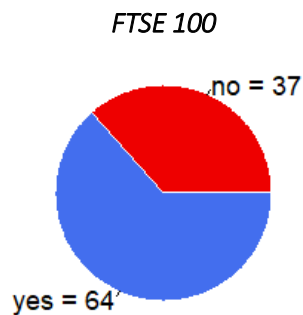


5. (b) in any part of its own business?



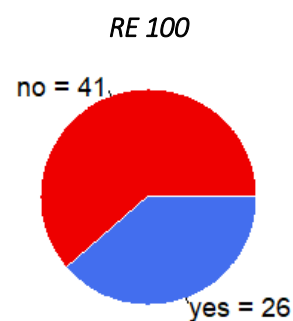
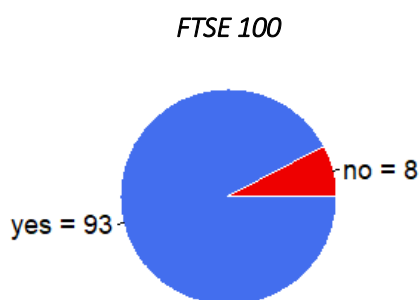
6. Included a defined fiscal year period, which the contents of the statement are meant to cover?

The organisation must have provided a defined fiscal year period that this statement is meant to cover including both month and year to earn the point. Simply indicating that the statement covers “2017” is insufficient. For example, [the statement published by DS Smith, a corrugated packaging provider](#), indicated it was meant to cover “2017/18” and applied to the “current financial year.” DS Smith did not earn this point because without any additional information the fiscal period covered by the statement is unclear.



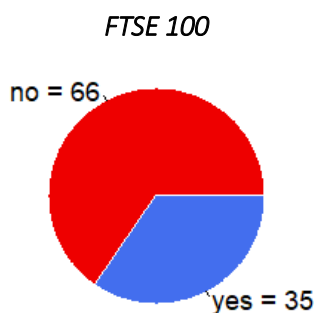
7. Complied with the annual publication requirement of MSA?

In order to earn these points, the organisation must have published annual statements pursuant to the MSA.



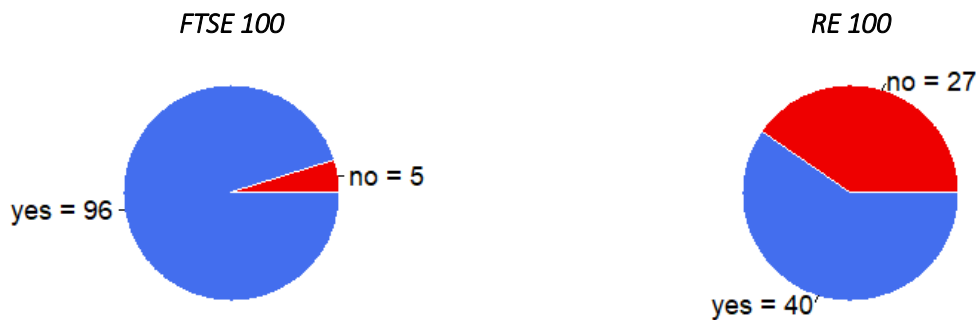
8. Identify which individual company(ies) is/are covered under the statement?

The organisation must identify all individual entities covered by its statement that are required to publish a statement under the MSA. Indicating that the statement is meant to cover an organisation and all of its subsidiaries or group entities subject to the MSA is insufficient without identification of those entities. An organisation can earn these points in a variety of ways. For example, [the insurance company Aviva included an annex to their statement](#) listing all 30 Aviva entities it was meant to cover.



9. Made clear statement was pursuant to MSA?

The statement must make clear that it was made pursuant to the U.K. Modern Slavery Act of 2015. The reader must be able to understand that the organisation’s statement is pursuant to the law. Mentioning “modern slavery” alone is not sufficient, as e.g. many California TISC statements also reference modern slavery.



D. Disclosure conformance and AS/AHT good practice

The AS/AHT good practice dimension has been joined to the conformance dimension given their thematic overlap. Disclosure conformance indicators are highlighted in yellow, whereas AS/AHT good practice indicators are highlighted in blue. Each indicator is explained in more detail, and pie charts are also featured for the FTSE 100 and Real Estate 100 cohorts, respectively, specifying how many companies’ statements fulfilled the particular indicator.

As per Section 54 of the law:

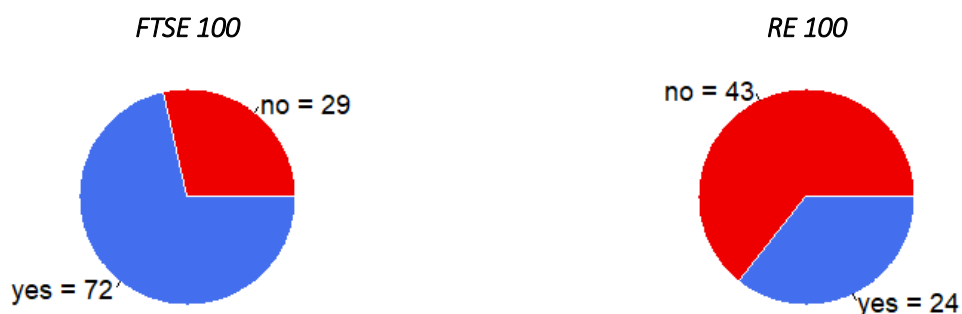
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(5) An organisation’s slavery and human trafficking statement may include information about—

“(a) information the organisation’s structure, its business and its supply chains;”

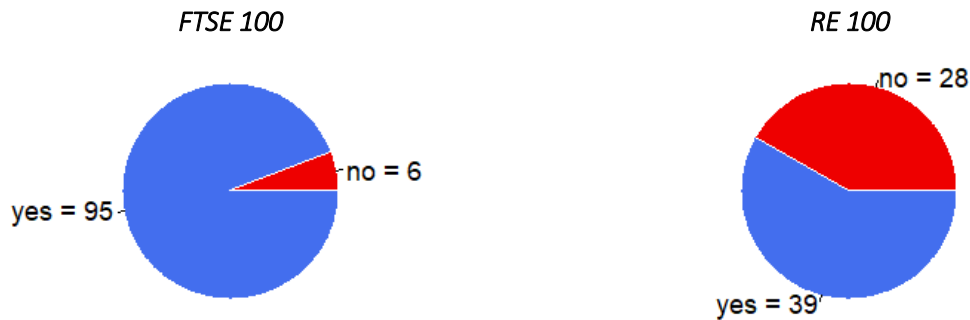
10. Does the organisation provide information about its: STRUCTURE?

Statement should discuss information pertaining to the organisation’s structure in order to earn the point. Discussion of corporate or management structure would be sufficient. Some organisation’s provided visual diagrams to enhance the reader’s understanding of their structure. For example, [the statement from health and hygiene company Reckitt Benckiser Group](#) included a flow chart outlining their governance structure to earn the point.



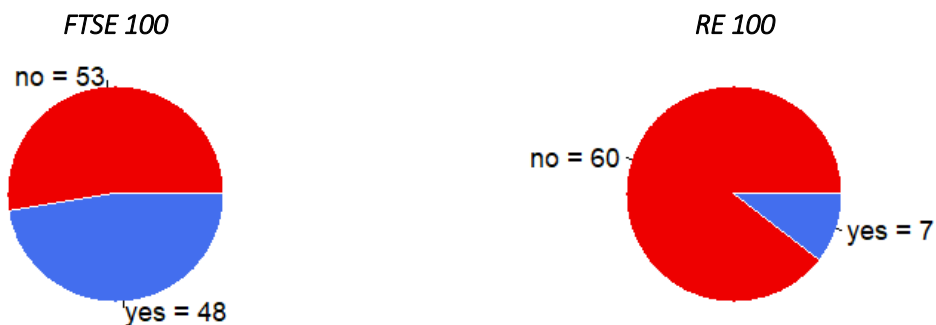
11. Does the organisation provide information about its: BUSINESS?

The organisation or group of organisations for which the statement was written constitutes "its own business." Any business relationship outside of that legal unit would be considered the supply/service chain. Statement should discuss information pertaining to the organisation's own business activities in order to earn the point. Examples of pertinent "information" include: the type of business, industry, type of services rendered and/or goods produced.



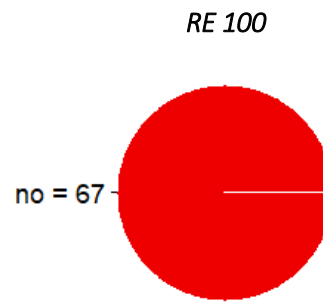
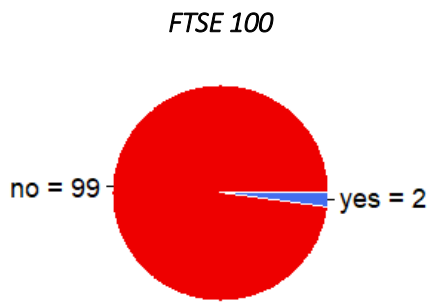
12. Does the organisation provide information about its: (a) supply / service chains OR (b) goods / services it procures directly for its operations (e.g. equipment, vehicles, etc.)?

The MSA represents a legislative effort to increase supply chain transparency. Organisations earning these points provided information about several quantitative aspects of their supply / service chains, such as country/ies of origin, number of suppliers, types of goods/services procured etc. Providing information in only one quantitative category, for example the number of suppliers, is alone insufficient to earn the points. If the company does not have traditional supply chains, the type of goods and services it procures directly for its operations should be explained.



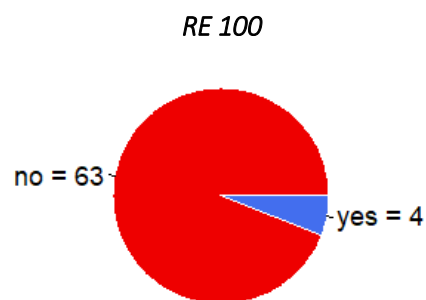
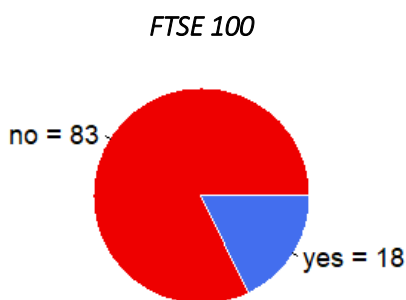
13. Supply/ service chains mapped down to level of raw materials or sub-contracting -- and provided examples in statement?

Organisations that earn these points provide a comprehensive accounting of their supply/service chain beyond their direct, Tier 1, suppliers and trace their supply/service chain to its termination e.g. raw materials.



14. Included visual diagram (e.g. charts/ maps) of supply/ service chain OR business activities?

A visual map or diagram helps the stakeholder conceptualize the scope of the organisation's operations and understand those operations vis-à-vis other relevant information, e.g. country or industry-specific risk(s). For example, [the statement from Johnson Matthey, a science and technology company](#), includes a world map with different colour dots to illustrate their procurement of raw materials. Similarly, [the statement from the retail company Tesco Group](#) includes a world map indicating not only which countries are part of its supply chain but also the risk of modern slavery in those locations.

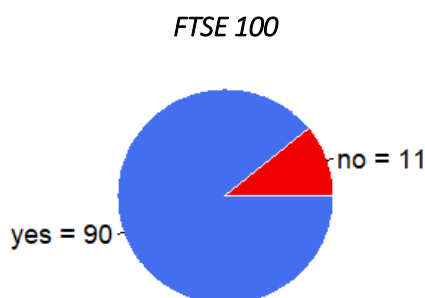


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“(b) information about its policies in relation to slavery and human trafficking;”

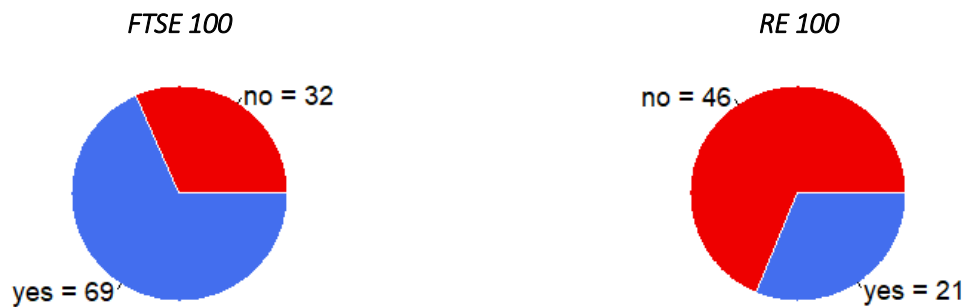
15. (a) Does the organisation have a distinct AS policy for their business? OR (b). Has the organisation incorporated AS-specific principles into their existing policies?

The policy needs to specify in what manner the organisation engages the issue of slavery and human trafficking. At least summary information should be provided; the statement needs to explicitly tie the organisation's policy to anti-slavery and anti-human trafficking to receive these points. This can be a separate stand-alone policy, or it can be integrated into the organisation's existing policies.



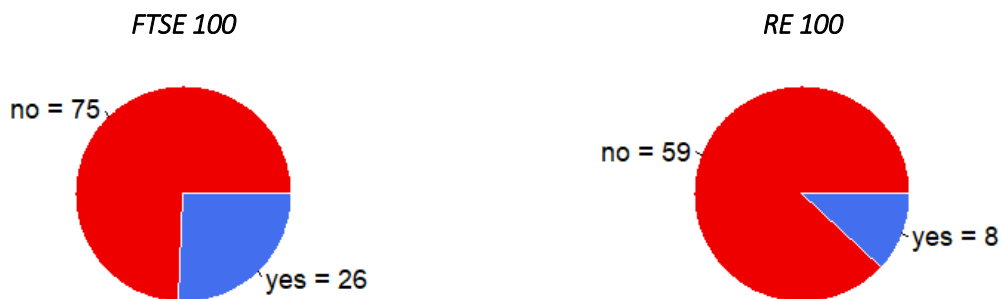
16. Policy implementation in particular by incorporating policy into supplier/ service provider contract clauses?

The incorporation of the policy into the contract clauses allows for the enforcement thereof in the event of relevant breaches. Only a contract clause that incorporates the organisation’s AS/AHT policy [or requiring suppliers to sign a similar document (such as a code of conduct) with an AS/AHT dimension] will receive these points. Requiring organisations to abide by Code of Conduct, without making it explicit that said Code addresses AS/AHT, will not receive points.



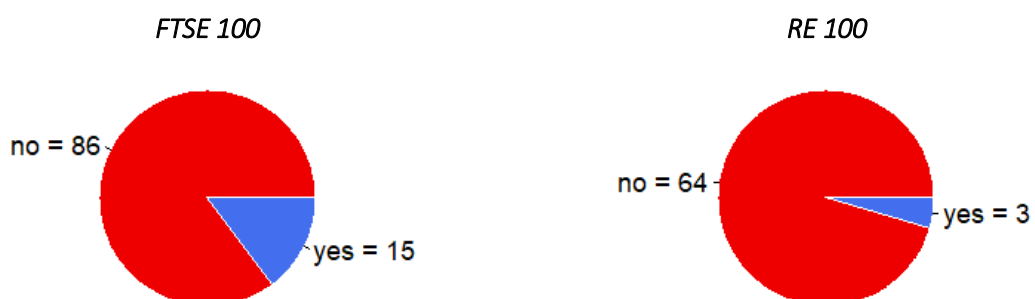
17. Policy enforcement (consequences for non-performance including suspension or dismissal of offending suppliers / providers)?

Policy enforcement involving AS/AHT would range from warnings all the way to contract termination, with a set procedure and clear consequences for non-compliance. [Bunzl Public Limited Company](#), for example, reported that they “stopped trading with four suppliers” after conducting audits.



18. Requires enforcement of "employer pays" principle?

For this point, the organisation specifically describes that it discourages the practice of worker recruitment fees ("employer pays" principle) in its supply/service chain. For example, [the statement from retail company Marks & Spencer](#) explains how they investigated some suppliers in accordance with their organisation’s policy against the payment of recruitment fees.

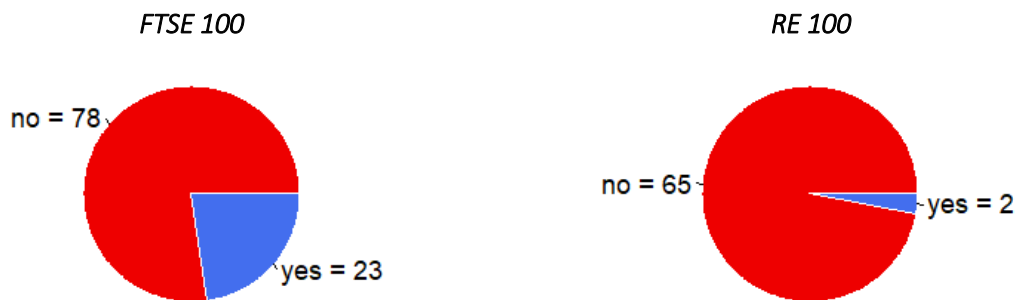


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“(c) information about its due diligence processes in relation to slavery and human trafficking in its business and supply chains;”

19. Does the organisation provide information about its due diligence processes in relation to Modern Slavery in its: BUSINESS?

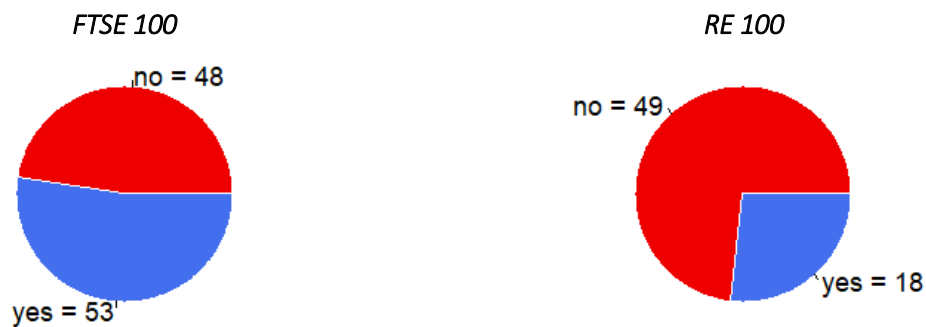
Due diligence with respect to an organisation’s own operations is a process undertaken to consider modern slavery implications before a business decision is made, e.g. before taking on a new client. Importantly, due diligence is distinct from other indicators, e.g. risk assessment alone, or training of employees alone, is not tantamount to due diligence.



20. Does the organisation provide information about its due diligence processes in relation to Modern Slavery in its: SUPPLY/SERVICE CHAINS (including clients, procurement)?

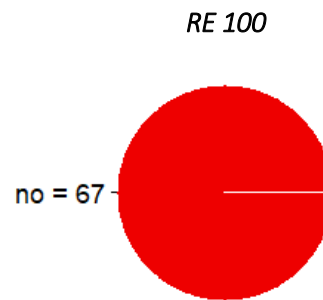
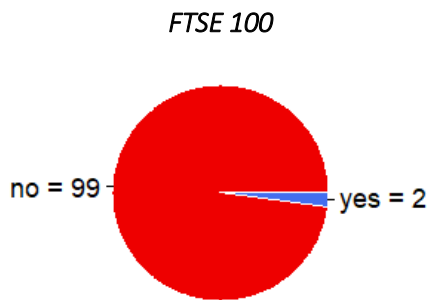
Due diligence with respect to an organisation’s supply/service chain is a process undertaken to consider modern slavery implications before a procurement-related decision is made, e.g. before renewing a contract with a supplier.

As stated above, risk assessment alone does not comprise due diligence, neither is solely the training of suppliers/providers. Audits, especially supplier onboarding audits, can be a form of due diligence if they are designed to be sensitive to slavery and human trafficking. The deployment of a supplier compliance questionnaire (MSA or other) is considered part of a due diligence process.



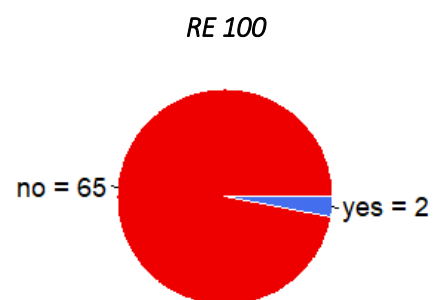
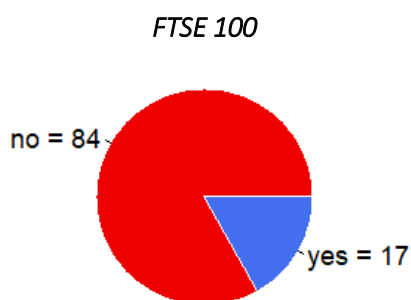
21. Is the due diligence standard referenced?

If an organisation does not use an internationally recognised due diligence standard, for this point they need to describe in detail the alternative due diligence standard.



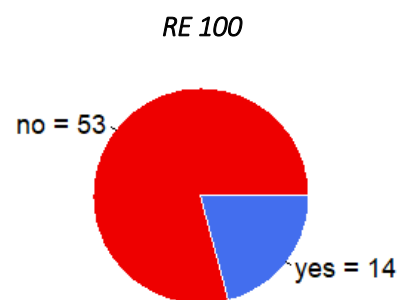
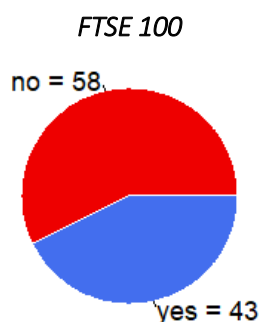
22. Prospective business activities (e.g. hiring employees) evaluated based on AS criteria?

Points are awarded when the organisation exercises due diligence in relation to modern slavery when considering potential business activities, for example when hiring employees.



23. Prospective suppliers/ providers evaluated/ screened based on AS criteria?

Points are awarded when the organisation exercises due diligence in relation to modern slavery when considering potential procurement activities, for example deciding whether or not to engage with a new supplier.

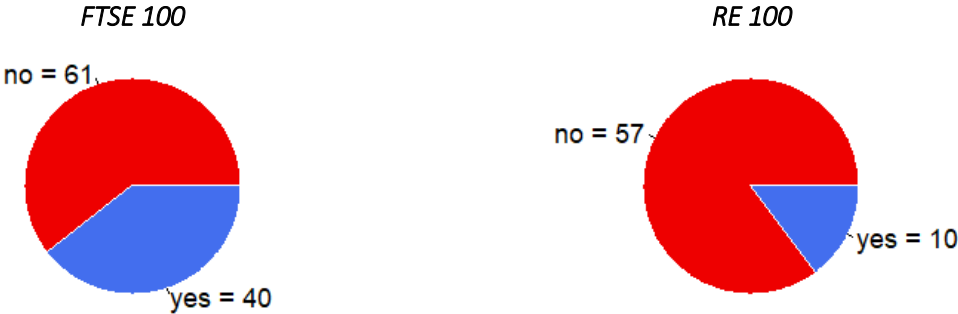


§ “(d) Information about the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;”

24. Does the organisation provide information about the parts of its BUSINESS where there is a risk of Modern Slavery taking place?

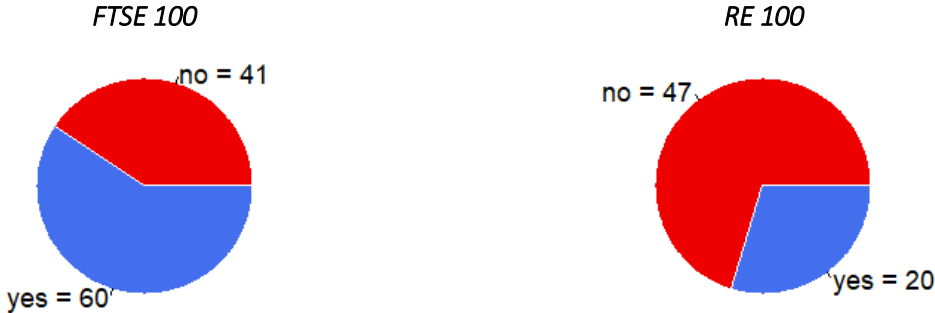
Organisations that earn this point describe where, in their own operations, there is a risk of modern slavery. For example, an organisation might identify its overseas manufacturing facilities as presenting

a modern slavery risk. Simply stating there is a low risk of modern slavery in the organisation due to the nature of its operations is insufficient.



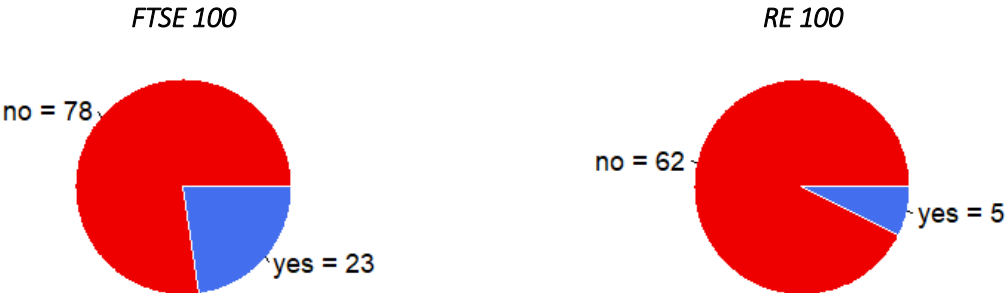
25. Does the organisation provide information about the parts of its SUPPLY/SERVICE CHAINS (e.g. procurement) where there is a risk of Modern Slavery taking place?

Organisations that earn this point describe where, in their supply/service chains, there is a risk of modern slavery. For example, an organisation might identify the procurement of certain types of goods as presenting a modern slavery risk. Specifying the at-risk country/ies, sector(s), or raw material(s) would be pertinent here. Simply stating there is a low risk of modern slavery in the organisation due to the nature of its supply/service chains is insufficient.



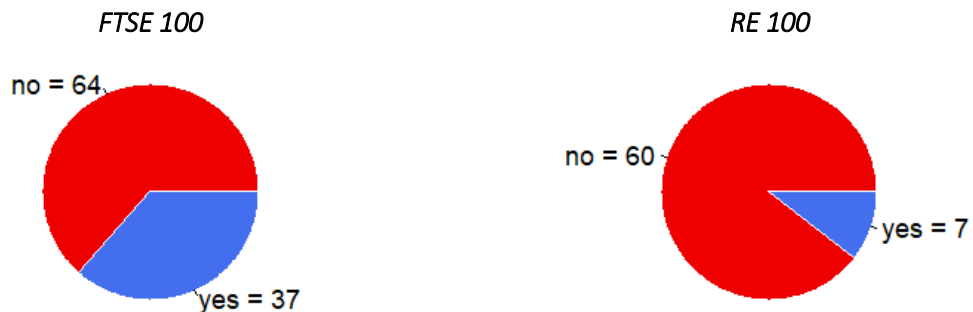
26. Modern Slavery risks in business described?

This indicator asks whether the organisation has identified and described the types of modern slavery risks, e.g. risk of child labour, in their own operations. This is a step beyond identifying which parts of an organisation implicate modern slavery risk.



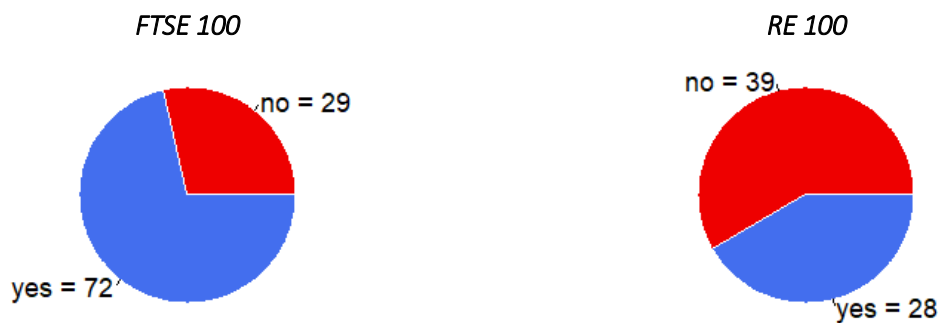
27. Modern Slavery risks in supply/service chains described?

This indicator asks whether the organisation has identified and described the types of modern slavery risks, e.g. risk of child labour, in their supply/service chains. This is a step beyond identifying which parts of an organisation's supply/service chain implicate modern slavery risk.



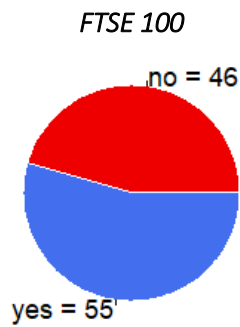
28. Does the organisation describe steps it has taken to ASSESS the risk of Modern Slavery in its BUSINESS?

"Risk assessment" is the identification of defined risks in the organisation that commonly involves an estimation of the likelihood of such risks, as well as the possible scope and impact of such risks. The question an organisation should readily be able to answer is: how is the organisation taking steps discover risks or potential risks? Simply stating: "Due to the nature of our business we think there is a low risk" does not get at steps or methods to assess the risk.



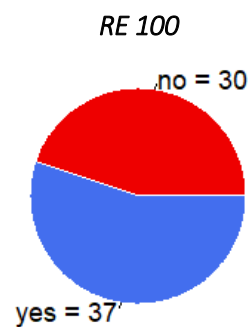
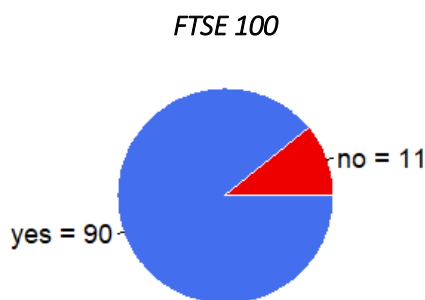
29. Does the organisation describe steps it has taken to MANAGE the risk of Modern Slavery in its BUSINESS?

Risk management is more than just writing a policy or conducting a risk assessment. It involves proactively addressing the risk and existence of modern slavery and human trafficking in the organisation's own operations. Management is proactive, as stated above, and enables organisations to remediate any issues that have been discovered. Due diligence, alone, is not tantamount to risk management.



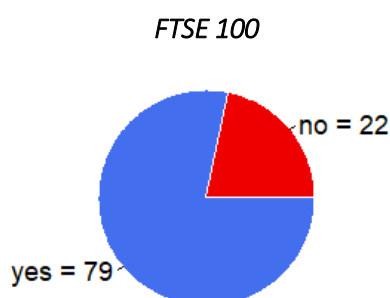
30. Does the organisation describe steps it has taken to ASSESS the risk of Modern Slavery in its SUPPLY/ SERVICE CHAINS (e.g. procurement)?

"Risk assessment" is the identification of defined risks in the organisation's supply/service chains that commonly involves an estimation of the likelihood of such risks, as well as the possible scope and impact of such risks. The question an organisation should readily be able to answer is: how is the organisation taking steps discover risks or potential risks? Simply stating: "Due to the nature of our supply chain we think there is a low risk" does not get at steps or methods to assess the risk.



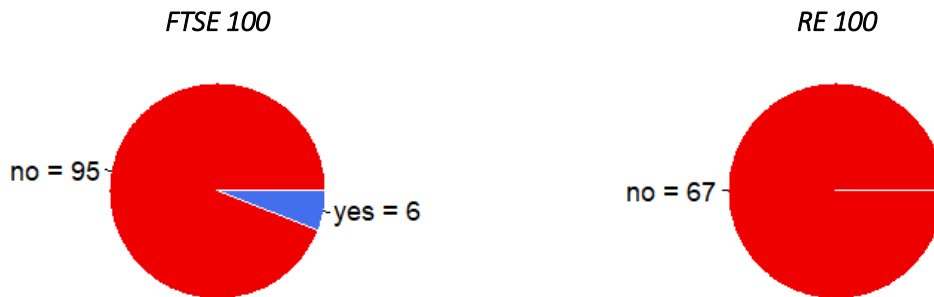
31. Does the organisation describe steps it has taken to MANAGE the risk of Modern Slavery in its SUPPLY/ SERVICE CHAINS (e.g. procurement)?

Risk management is more than just writing a policy or conducting a risk assessment. It involves proactively addressing the risk and existence of modern slavery and human trafficking in the organisation's supply/service chains. Management is proactive, as stated above, and enables organisations to remediate issues that have been discovered. Due diligence, alone, is not tantamount to risk management.



32. Metrics (KPIs) for business risk assessment discussed? (e.g. frequency of risk assessment, % assessed)?

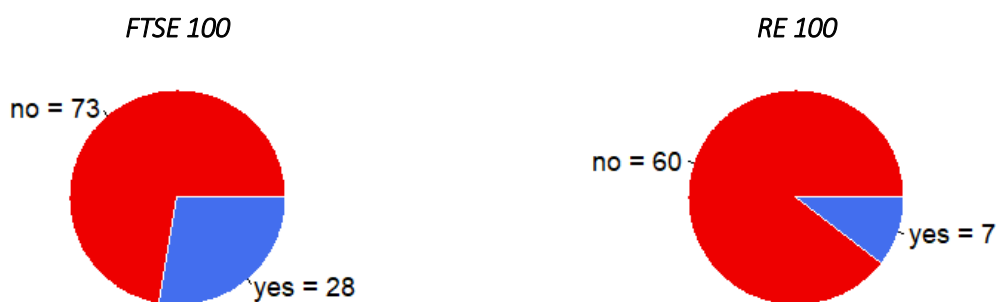
KPIs for risk assessment could include: % of operations assessed for risk, % of operations in at-risk countries assessed, frequency of risk assessment, etc.



33. Metrics (KPIs) for supplier/provider risk assessment discussed? (e.g. frequency of risk assessment, % assessed)?

KPIs for risk assessment could include: % of spend assessed for risk, % of suppliers in at-risk countries assessed, frequency of risk assessment, etc. [National Grid](#), for example, tracks the following KPIs across its “business, suppliers and peers:

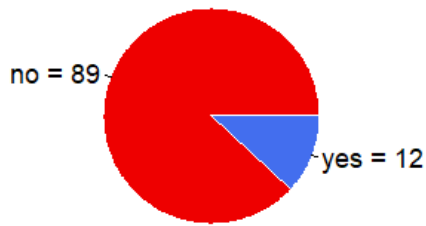
- Desktop risk assessments completed;
- Potential high-risk suppliers identified;
- Direct engagement with potential high-risk suppliers to date;
- Organisations with which we have directly engaged on best practice to date.”



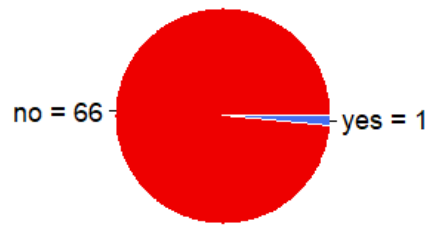
34. Audits of business activities performed?

Audits can be conducted by the organisation itself or a qualified 3rd party. Audits must include a methodical examination and review of the organisation’s own operations.

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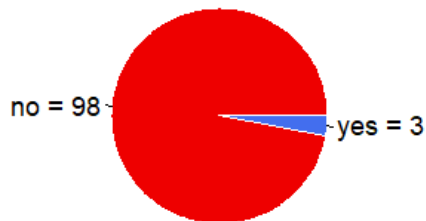
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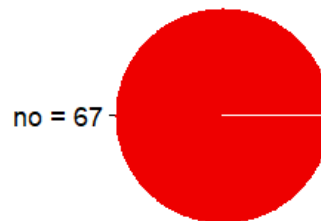
35. Metrics (KPIs) for business audits discussed (e.g. frequency of audits)?

KPIs for audits could include: frequency of audits, % of operations audited. A KPI that addresses the trigger for an audit is not in-scope of this indicator.

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36. Audits of suppliers/providers performed?

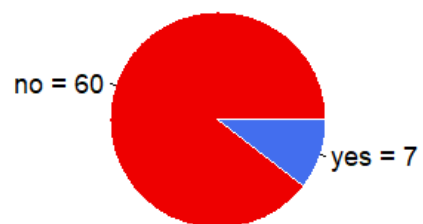
Audits can be conducted by the organisation itself or a qualified 3rd party. Audits must include a methodical examination and review of the organisation’s suppliers/providers.

Bunzl Public Limited Company, for example, audits its suppliers: “the Global Sourcing team performed 503 supplier audits covering suppliers in Asia. In addition, 8 supplier audits were carried out in medium risk countries outside of Asia. As a result of these audits, our Global Sourcing team has worked with 43 suppliers to improve their employment practices.” Burberry Group Plc reports having “conducted 446 audits and 263 engagement visits or trainings” in 2017/18. “The majority of these activities are conducted by our internal Responsibility team to build trust in our ongoing partnerships and drive continuous improvement together,” they report.

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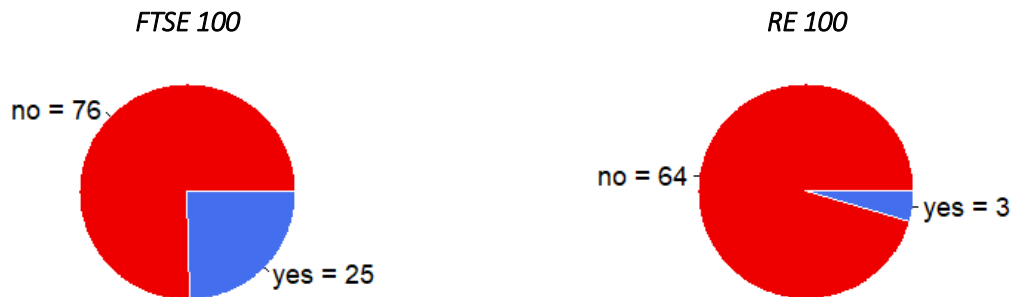


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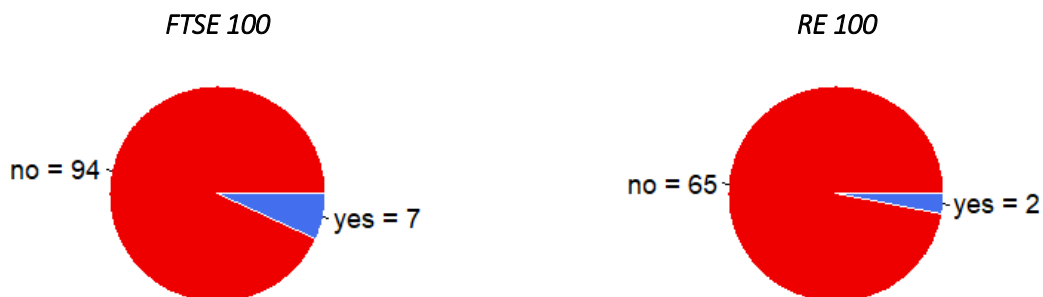
37. Metrics (KPIs) for supplier/provider audits discussed (e.g. frequency of audits)?

KPIs for audits could include: frequency of audits, % of suppliers/providers audited. A KPI that gets at the trigger for an audit is not in-scope of this indicator.



38. Site visits and/or spot checks at supplier/ provider sites further down the supply/ service chains?

For this indicator, “further down the supply/ service chains” means below Tier 1 suppliers/providers.

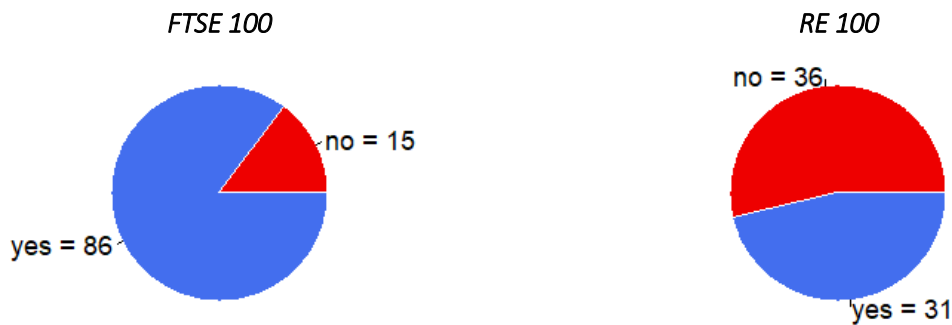


39. Does the organisation maintain a whistleblower mechanism or ethics hotline within its own business?

The existence of a whistleblower mechanism or ethics hotline within the organisation’s own business earns this point. Simply stating something to the effect that: “We protect whistleblowers,” without describing the existing of a functioning ethics hotline or similar, does not receive these points.

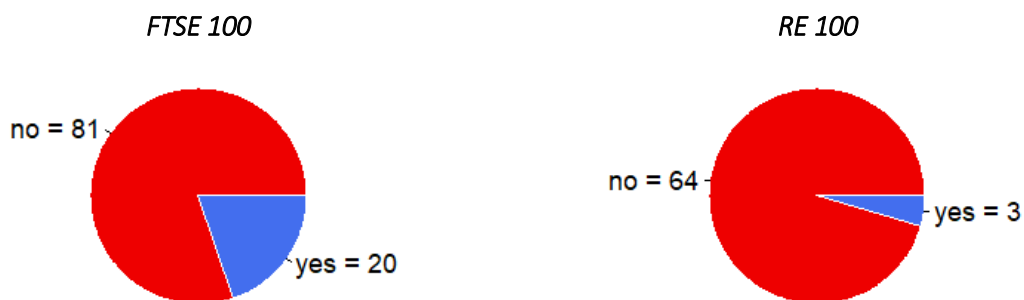
[Anglo American Plc](#), for example, describes its 3rd party grievance mechanism: “Our independently managed ‘Speak Up’ facility is a confidential and secure means for our employees, contractors, suppliers, business partners and other external stakeholders around the world to report concerns about conduct that is contrary to our values and integrity standards. Complaints can be submitted anonymously and are handled by a third party. We do not tolerate any form of retaliation against employees raising concerns in good faith. During 2017, we received 225 alerts plus another 660 alerts related to a scam committed by a gang of fraudsters against suppliers and other companies – overall, no alerts were categorised as being related to modern slavery or human trafficking.” [BT Group Plc](#), as well, provides a focal point for ethical issues: “Our global, confidential Speak Up helpdesk gives people an easy way to flag unethical behaviour. This year we made the helpdesk easier to find, and we introduced FAQs to help people report issues. 482 concerns were raised this year, compared with 296

last year.”



40. Does the organisation maintain a worker-level incident detection and reporting system or whistleblower mechanism for its supply/service chains (e.g. operational-level)?

Providing worker-level access to a reporting mechanism, e.g. a grievance mechanism in the form of a hotline, qualifies for these points. A worker-level grievance mechanism allows workers to report issues with an independent body within the organisation or a 3rd party, and be ensured whistleblower protections. Some companies e.g. referenced [Laborlink](#), a service which provides employees with a simple, local-language questionnaire delivered via an interactive voice response (IVR) menu with pre-recorded questions, accessed by dialling a local phone number, with a callback facility, at any time.



§ “e) Information about its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against performance indicators”

41. Does the organisation provide information about its effectiveness in eliminating Modern Slavery from its business or supply chains, measured against such performance indicators as it considers appropriate?

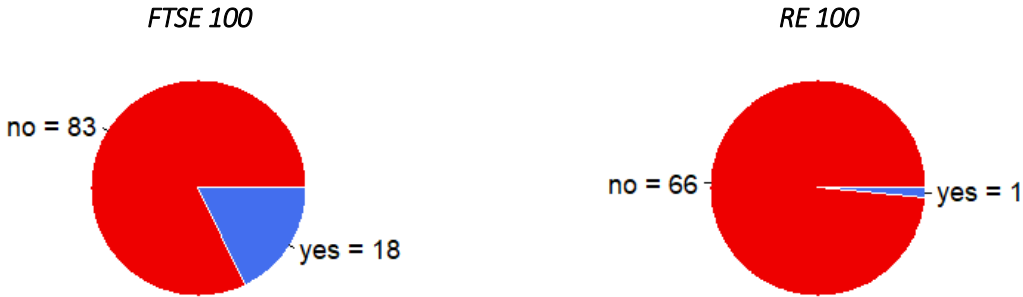
Selected KPIs must be plausibly quantifiable and measurable, and the measured activity or outcome must be of a recurring nature. Both process and outcome KPIs are of relevance here. It is preferred that organisations clearly identify their *Key Performance Indicators*, but the organisation need not necessarily use that term to earn the point provided they evaluate their effectiveness based on quantifiable metrics. KPIs that the organisation planned to implement in the future did not receive points.

[Howard de Walden Estates Holdings](#) are reportedly implementing KPIs on (1) audits that have been completed on suppliers, (2) the “completion of training for all key procurement and supply management personnel as well as other members of staff,” and (3) “the operation of a whistleblowing facility for staff to enable them to report suspicions of modern slavery or human trafficking occurring within the Estate's business or supply chain.”



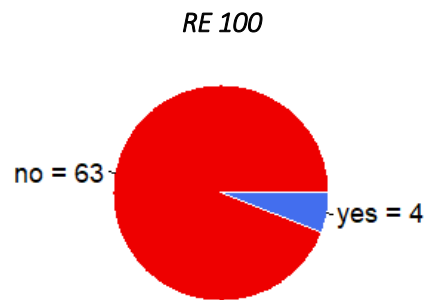
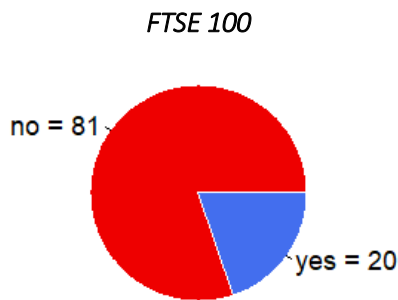
42. Year-over-year improvement / change measured based on the selected KPIs?

Once KPIs have been set, what were the year-over-year changes observed? A quantified measure (e.g. %) would need to have been employed to earn these points.



43. Remediation of specific incidents / cases discussed?

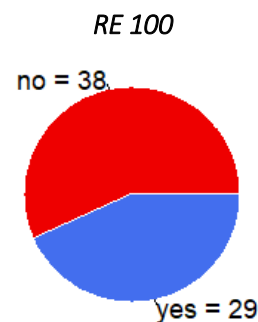
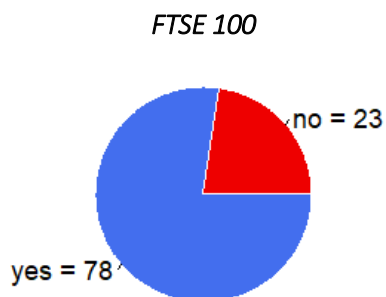
If an organisation has identified specific incidents of modern slavery, points are earned for describing the remediation process employed to rectify the situation. Incidents that are not yet fully resolved do not earn these points. [Centrica Plc](#), upon having analysed audit findings with suppliers, agreed with suppliers in 18 cases on remedial actions (Corrective Action Plans), relating to health, safety, environment and labour practices in 2017. Also, through the [SEDEX](#)’ SMETA Stakeholder Forum, companies participate in collective working groups on issues ranging from audit non-conformances, wages and working hours to joint remediation, worker voice and forced labour.



§ “(f) Information about the training about slavery and human trafficking available to its staff.”

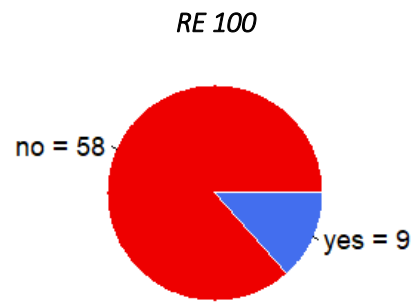
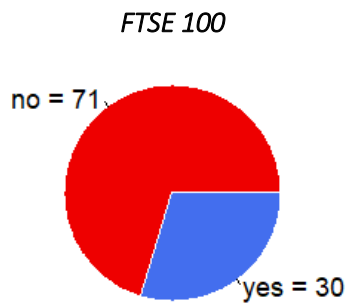
44. (a) Does the organisation have a distinct MS training programme for their business? OR (b) Has the organisation incorporated MS-specific training into their existing training programme?

Training one’s staff on slavery and human trafficking starts with sensitising them to the organisation’s own policy and code of conduct. Introducing employees to the organisation’s relevant policies, systems, and procedures is the next step. Stating something to the effect that “We have made all employees aware of our policy” would not suffice, as handing your employee a policy statement is not necessarily training on specific action they should or should not take. Similarly, stating something to the effect that “We train all employees on our code of conduct which includes human rights” is not specific to MS.



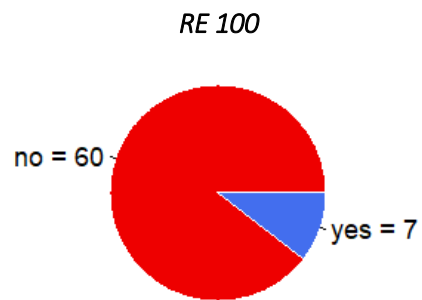
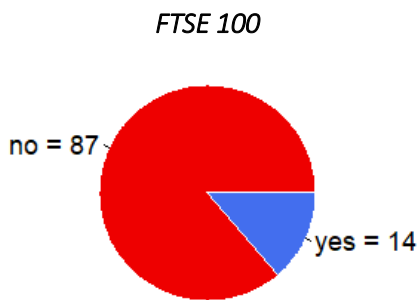
45. Appropriate training delivered to the relevant parties within the company (e.g. procurement, management, legal, etc.)?

Certain departments and layers within the organisation have their own specialized responsibility to prevent modern slavery in its value chains. Sufficient specificity is required, either detailing the specific departments being trained, or information that all parties within the organisation are sufficiently trained on the organisation’s modern slavery policy, systems, programmes and procedures. [The statement from the retail company Tesco Group](#) reports that they “monitor data pertaining to the training of [their] colleagues and suppliers on modern slavery. We have now trained over 300 Tesco colleagues on modern slavery including more than 80% of UK Technical Managers and Product Integrity Auditors.”



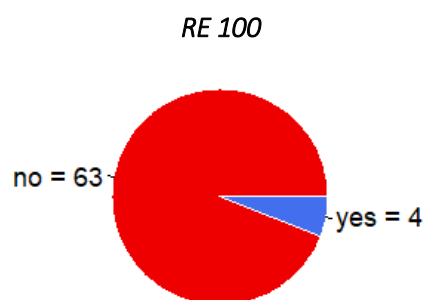
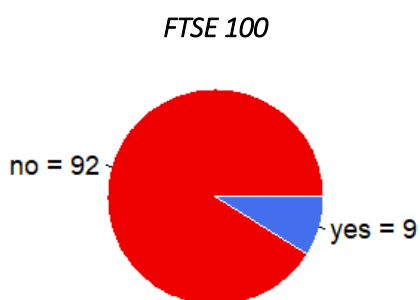
46. Company also offered training to high-spend or high-risk tier 1 suppliers / providers?

Organisations earn these points when they host or sponsor workshops with suppliers/providers to sensitize and educate their business partners on the issue. This training may be provided by either the organisation itself or through 3rd party. [The Tesco Group](#) trains its U.K. suppliers, for example. Since 2013 when the training first began, they reportedly have trained a total of 632 suppliers, represented by 1,114 attendees.



47. AS / AHT training done by 3rd party?

Organisations receive this point for engaging an outside third party to provide MS training to its staff. Training provided by an entity related to the organisation, for example a parent company, will not receive this point.



E. Aggregate scores

1. FTSE 100

i. Legal compliance

Figure 9: FTSE 100, sector-specific legal compliance

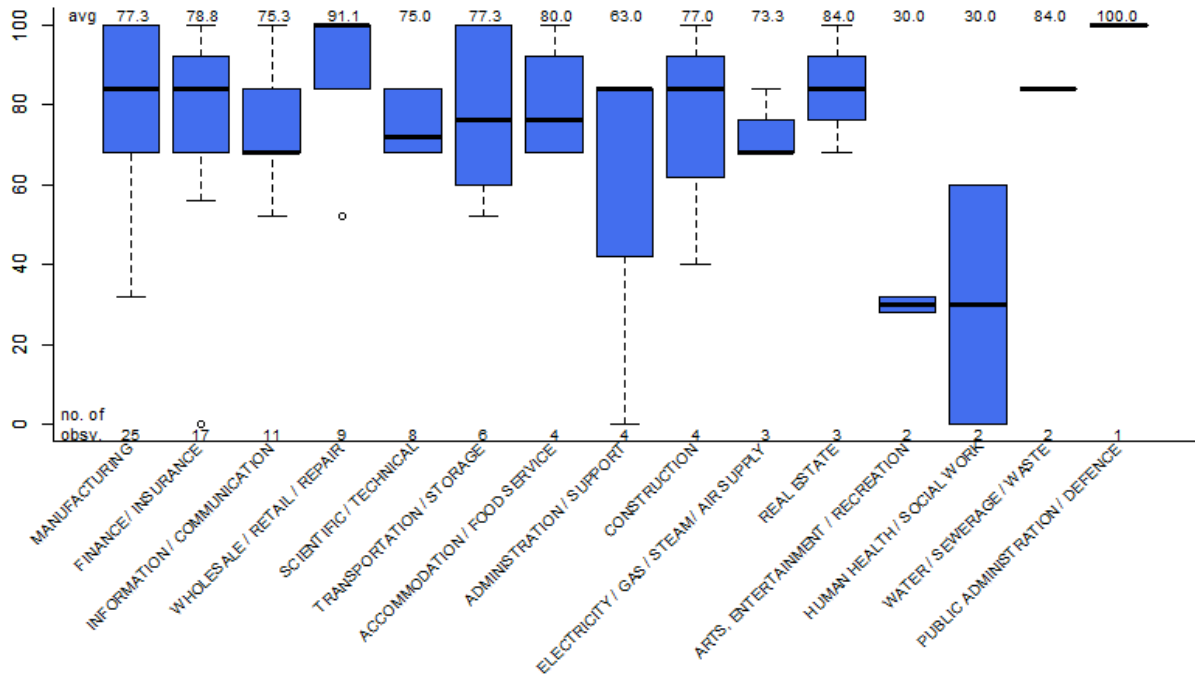
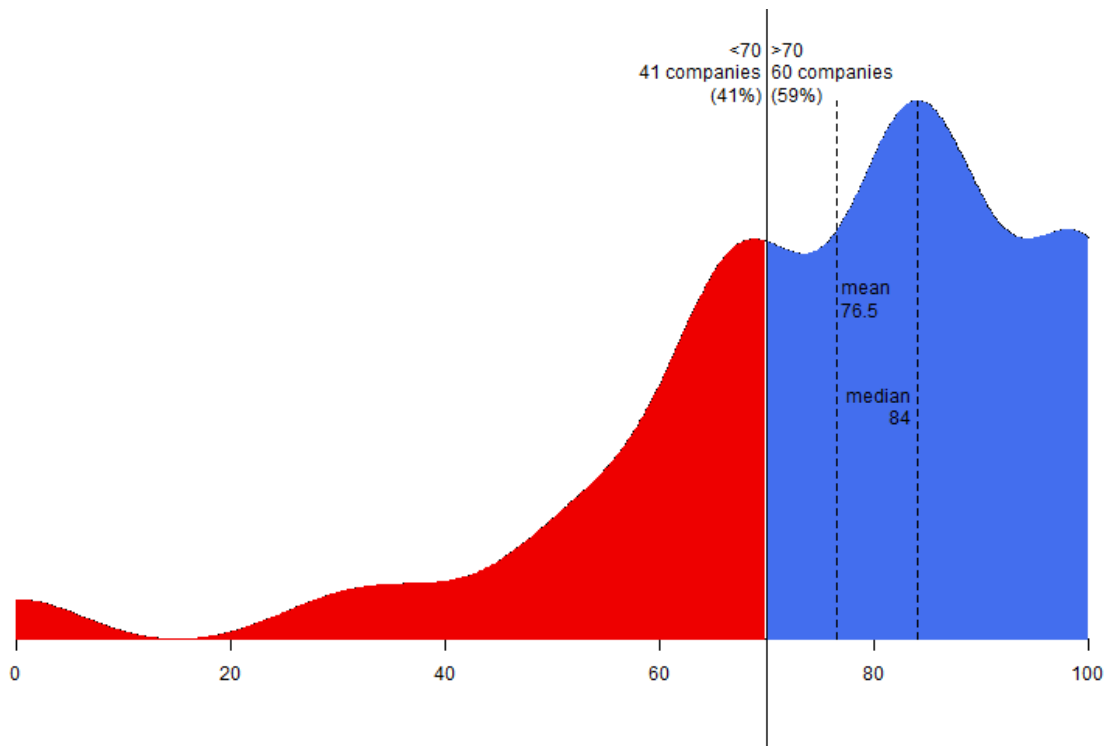


Figure 10: FTSE 100, legal compliance score distribution



ii. Disclosure conformance

Figure 11: FTSE 100, sector-specific disclosure conformance scores

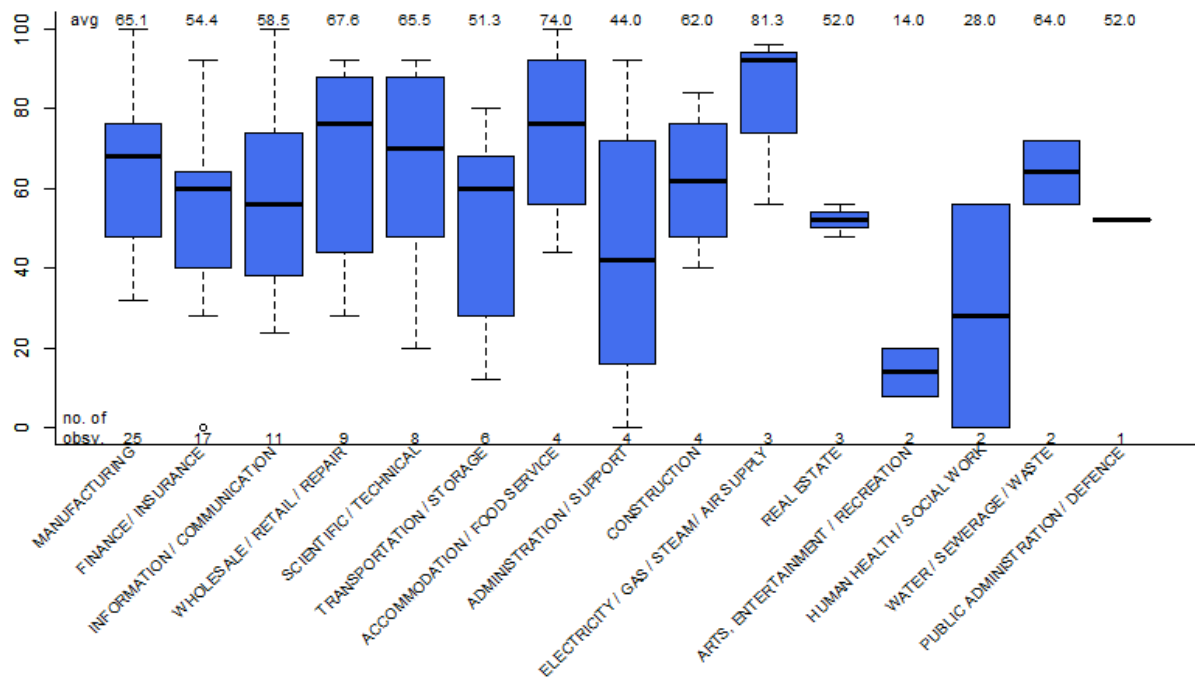
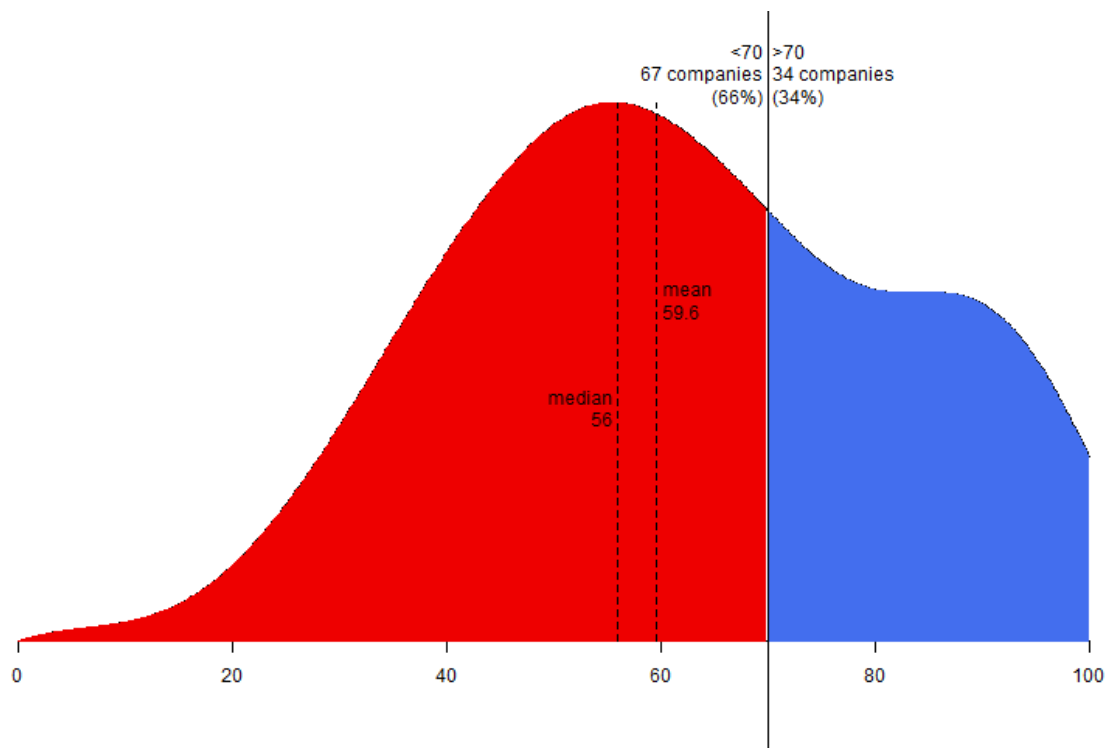


Figure 12: FTSE 100, disclosure conformance score distribution



iii. AS/AHT good practice

Figure 13: FTSE 100, sector-specific AS/AHT good practice scores

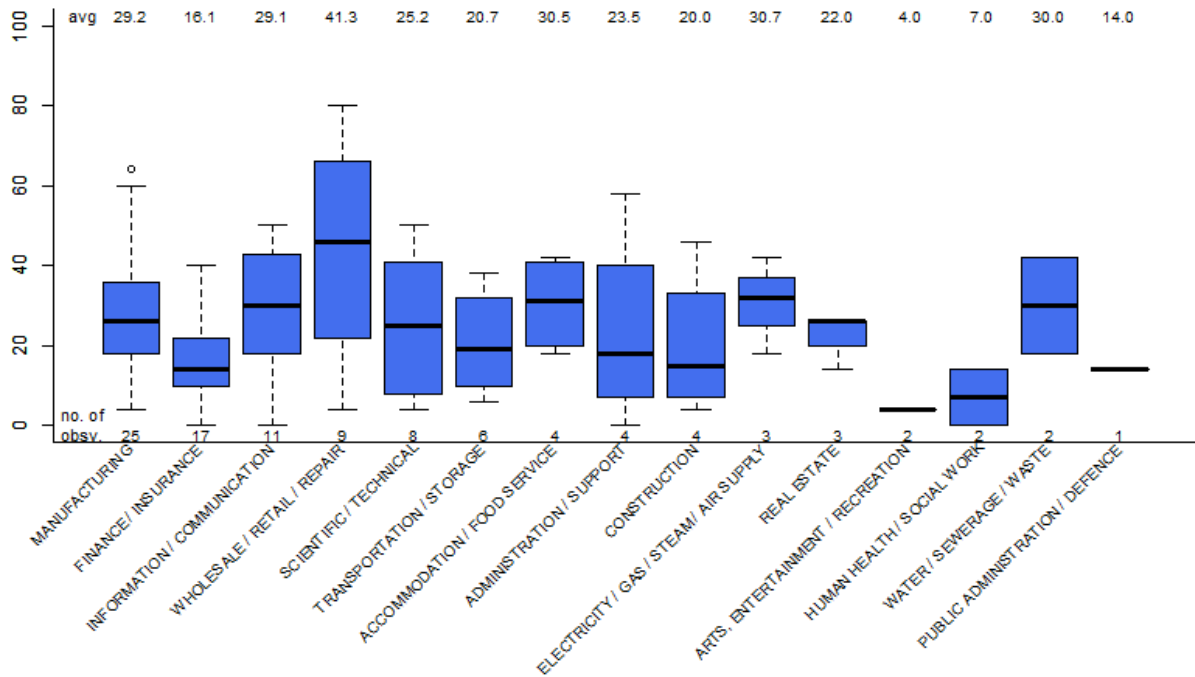
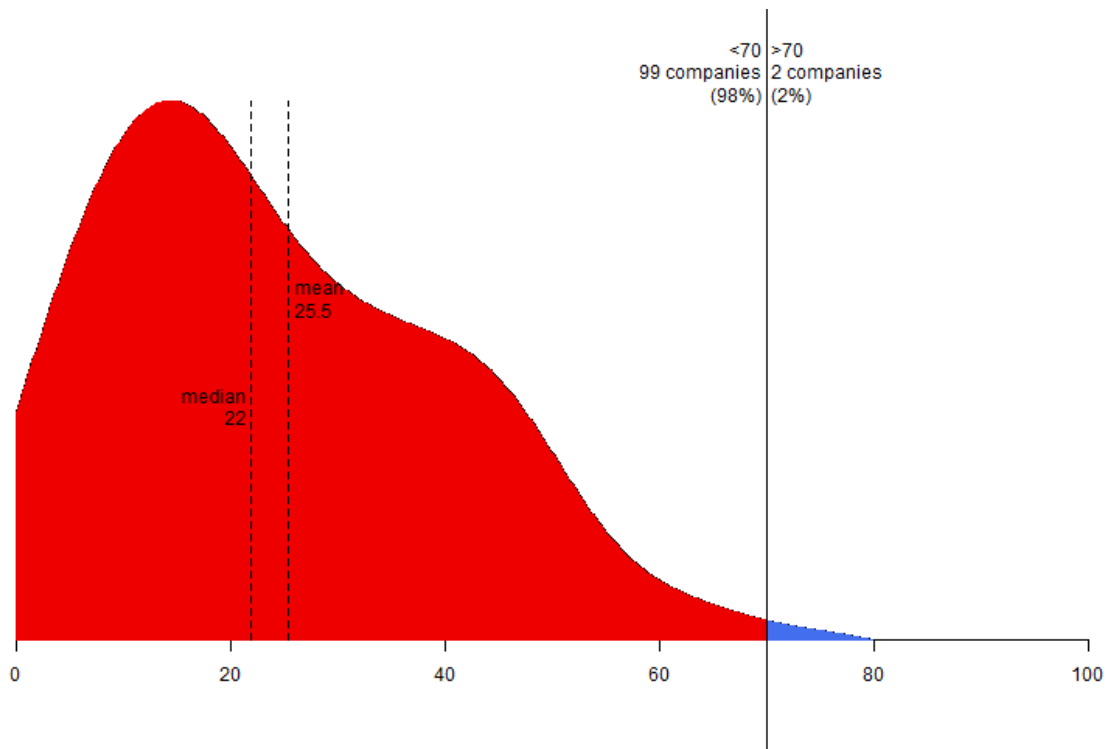


Figure 14: FTSE 100, AS/AHT good practice score distribution



iv. Combined Scores

Figure 15: FTSE 100, combined compliance, conformance and AS/AHT good practice scores, sector-specific

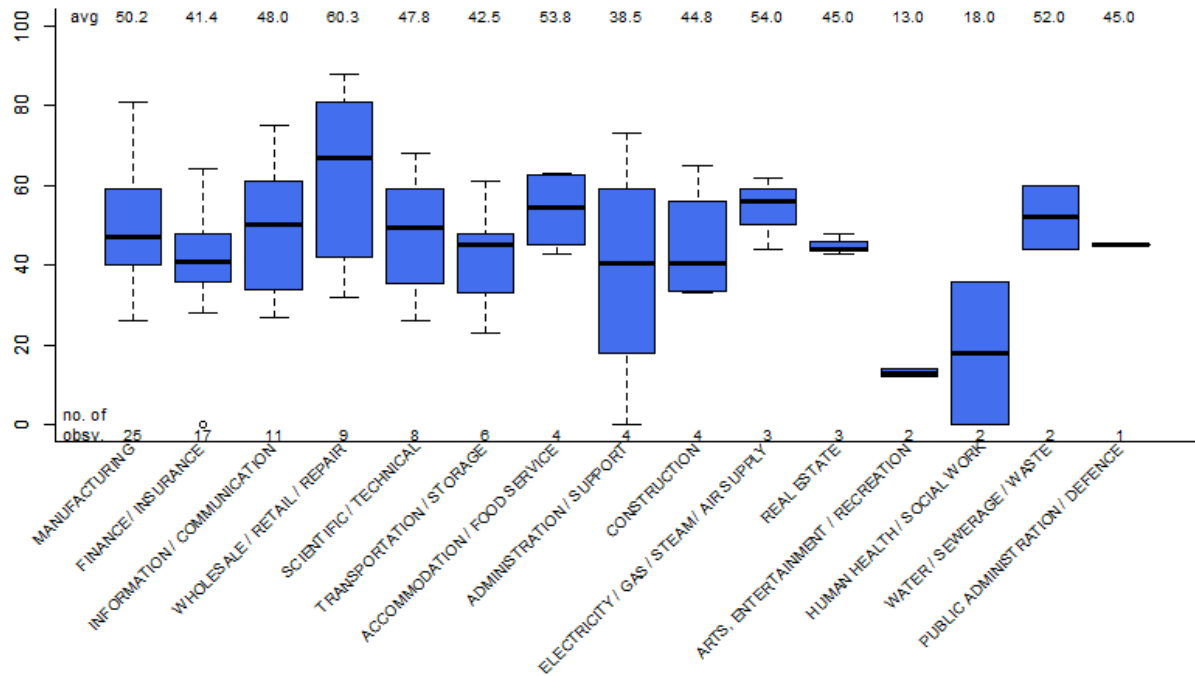
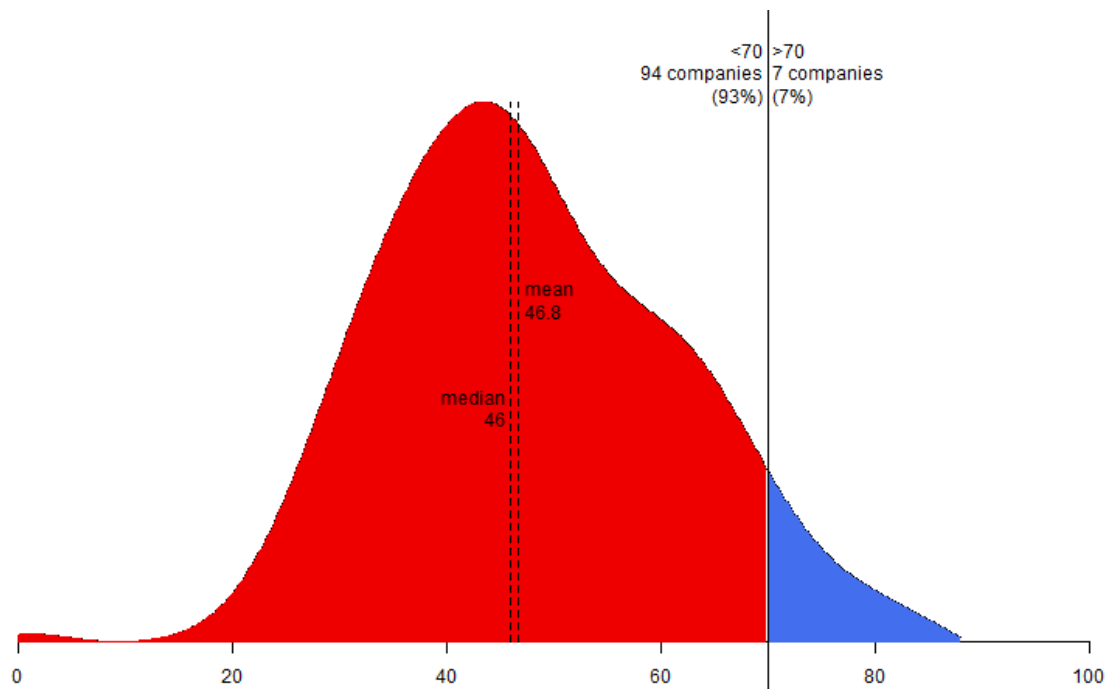


Figure 16: FTSE 100, combined compliance, conformance and AS/AHT good practice score distribution



1. Real Estate 100

i. Legal compliance

Figure 17: Real Estate 100, sector-specific legal compliance scores

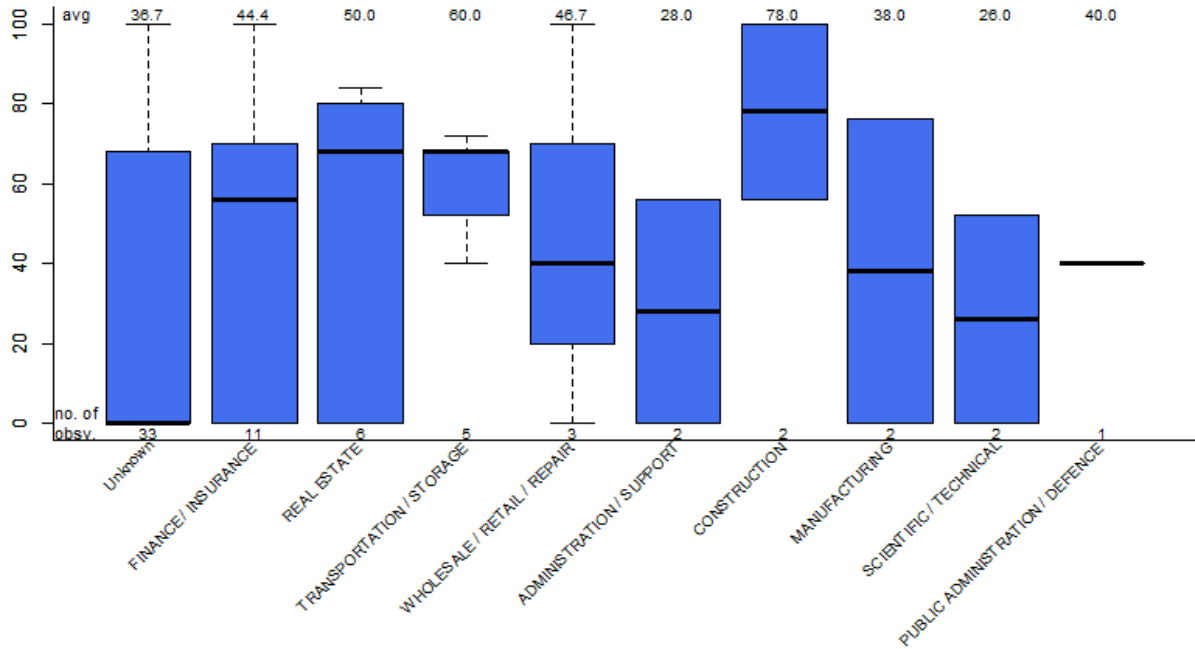
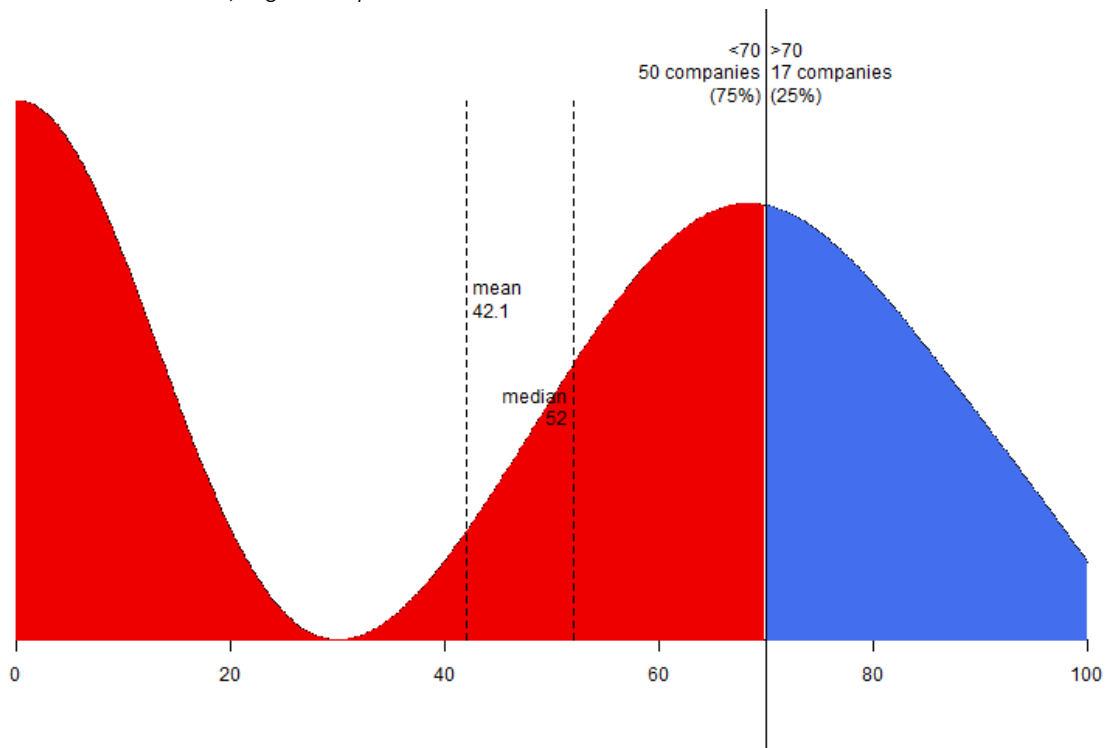


Figure 18: Real Estate 100, legal compliance score distribution



ii. Disclosure conformance

Figure 19: Real Estate 100, sector-specific disclosure conformance scores

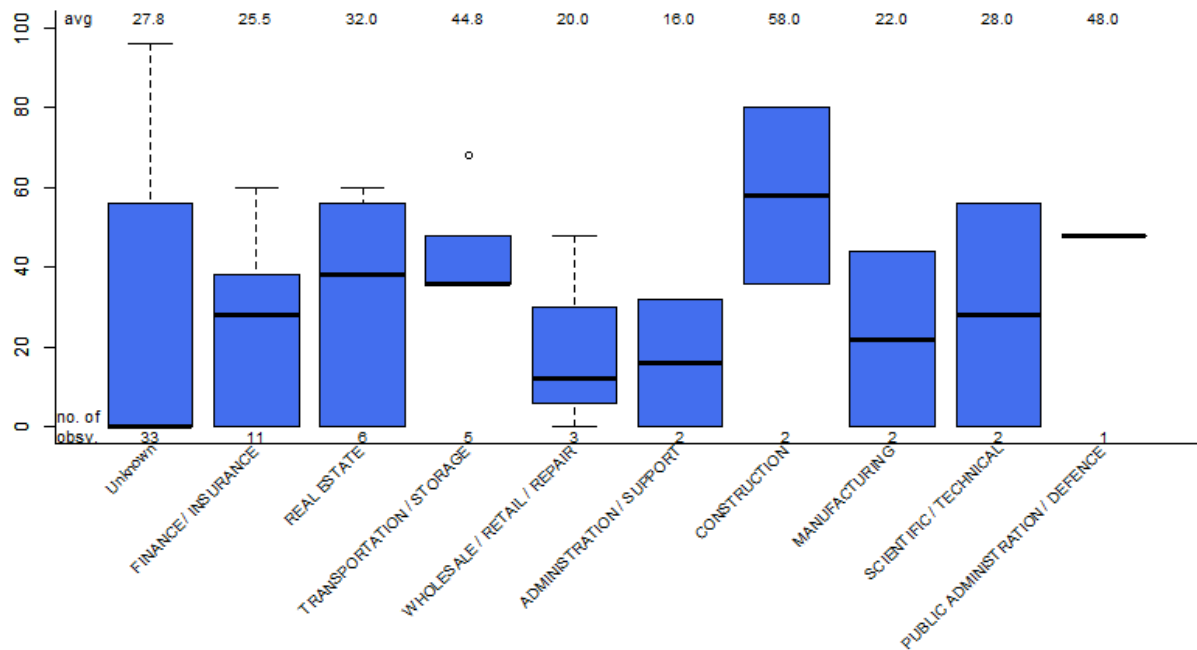
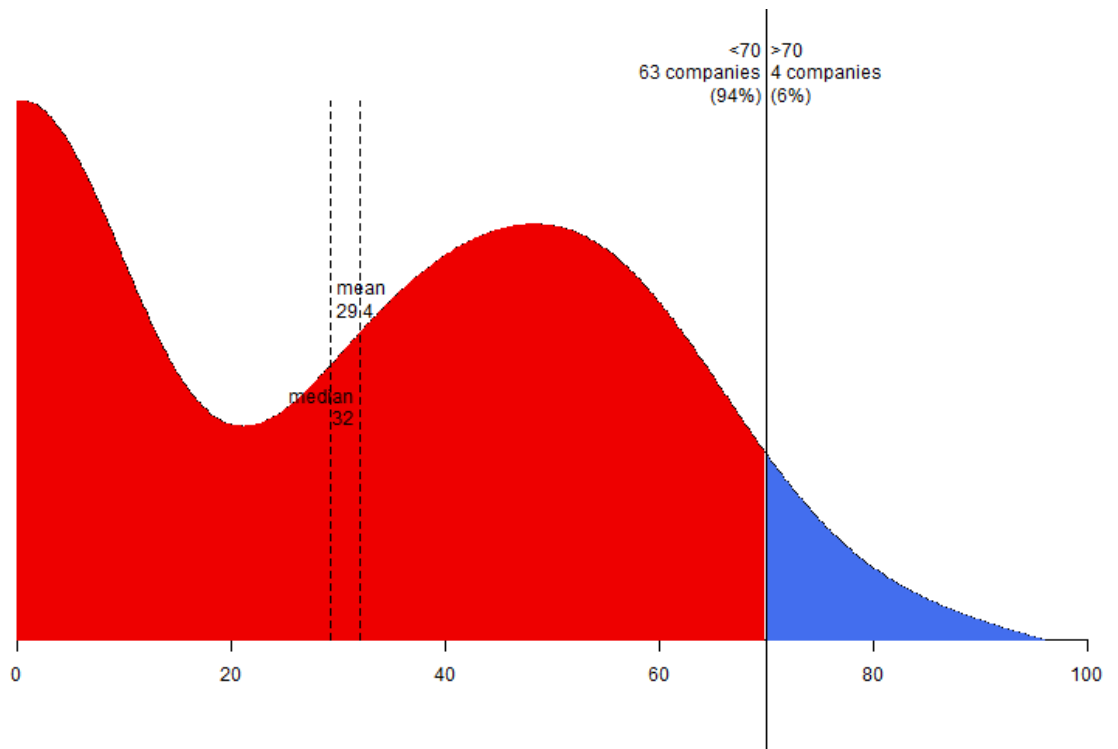


Figure 20: Real Estate 100, disclosure conformance score distribution



iii. AS/AHT good practice

Figure 21: Real Estate 100, sector-specific AS/AHT good practice scores

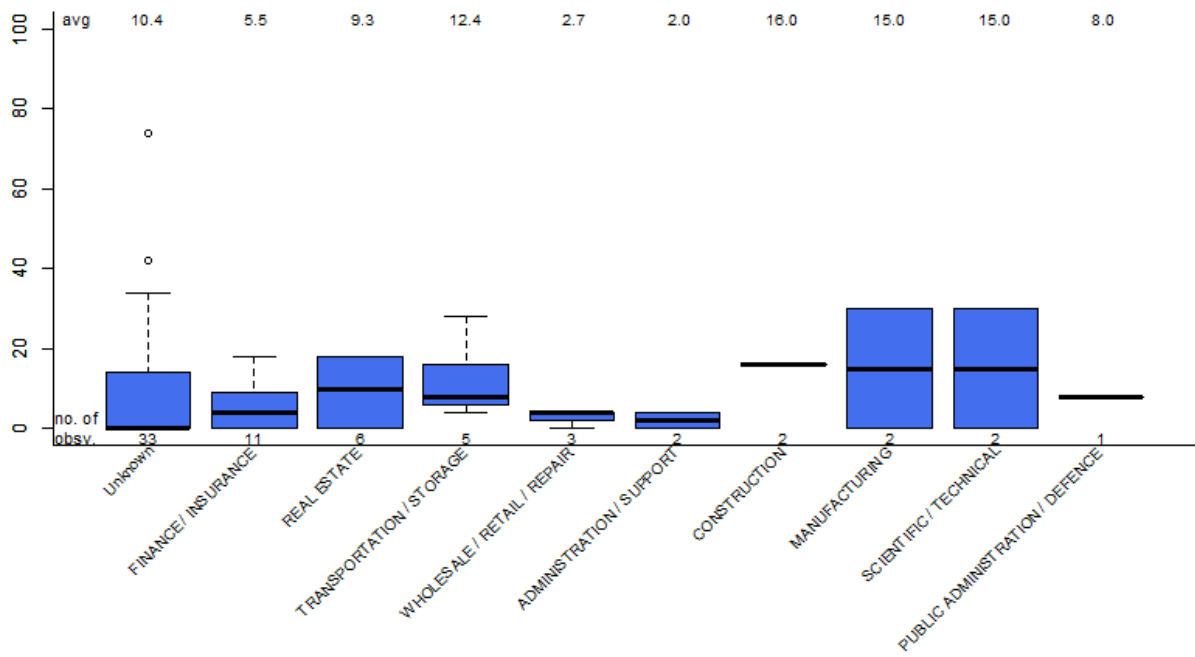
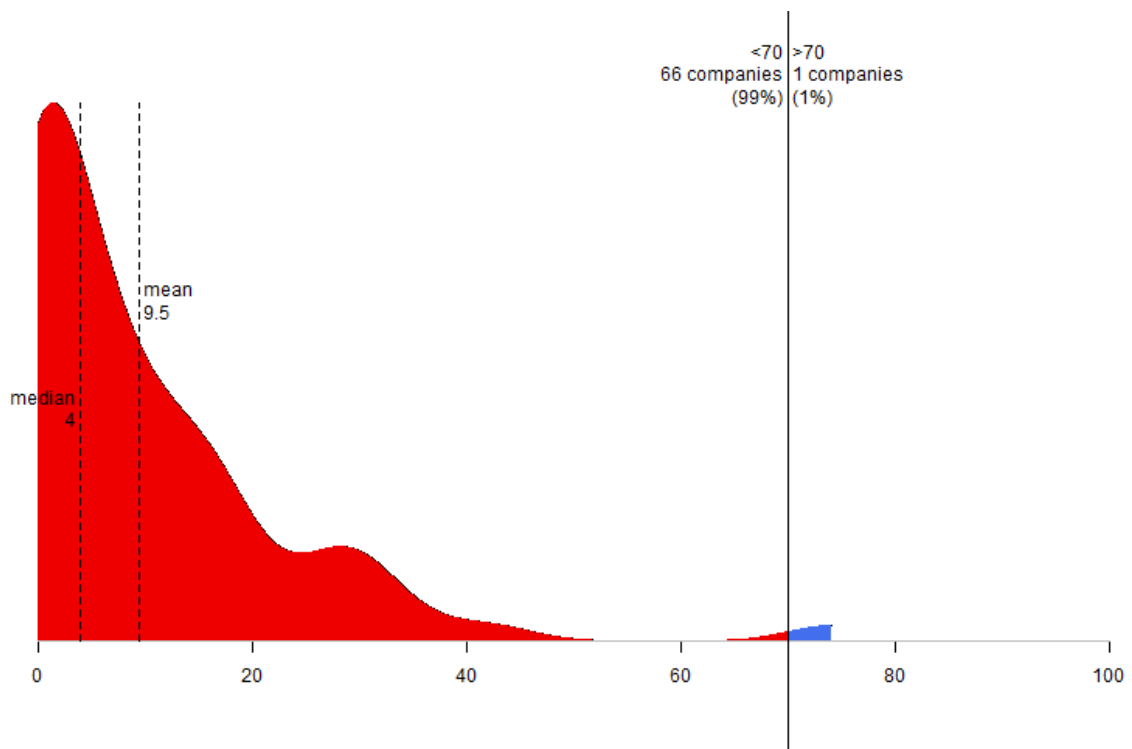


Figure 22: Real Estate 100, AS/AHT good practice score distribution



iv. Combined Scores

Figure 23: Real Estate 100, combined compliance, conformance and AS/AHT good practice scores, sector-specific

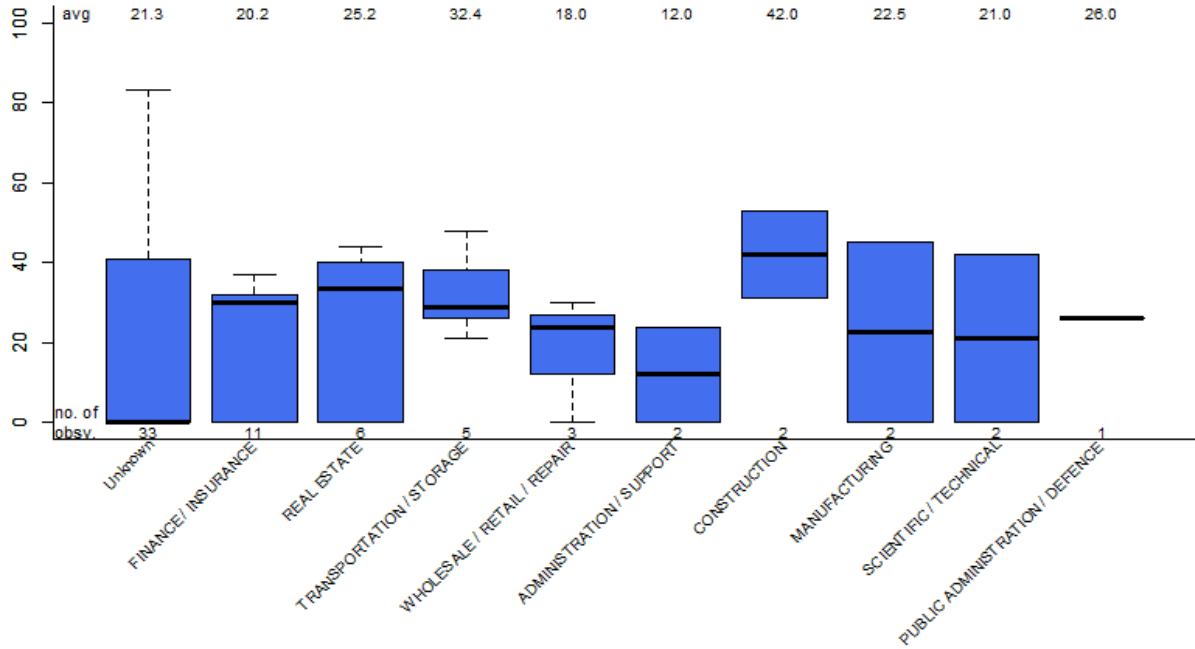
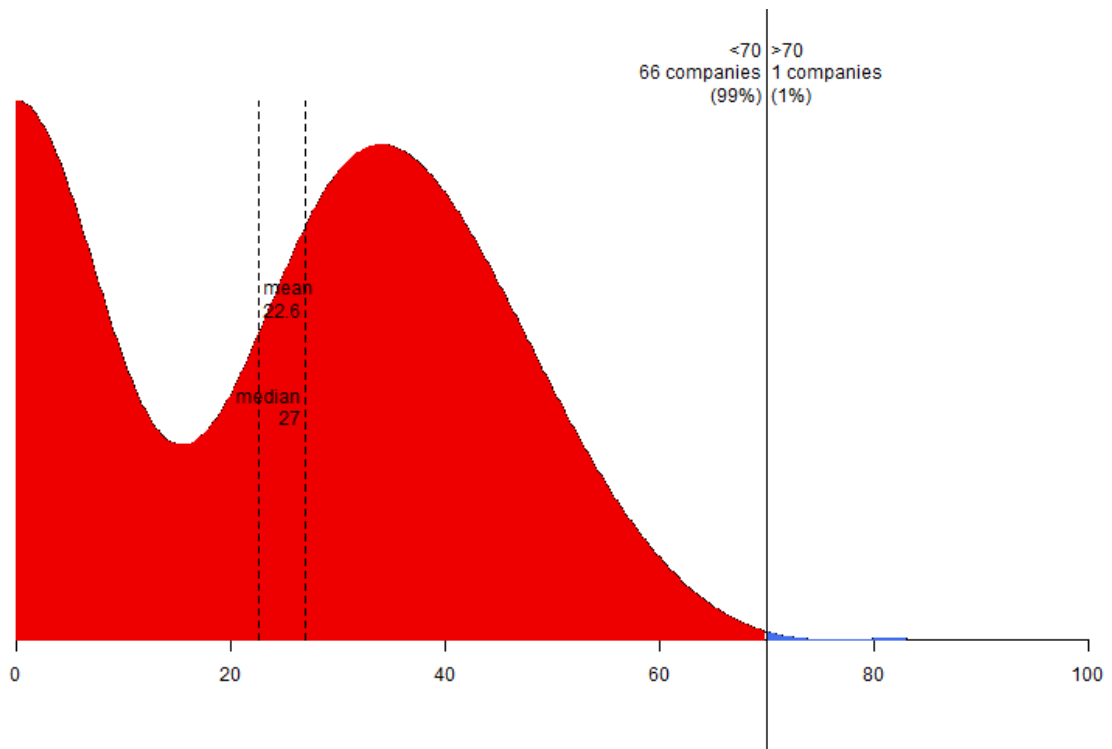
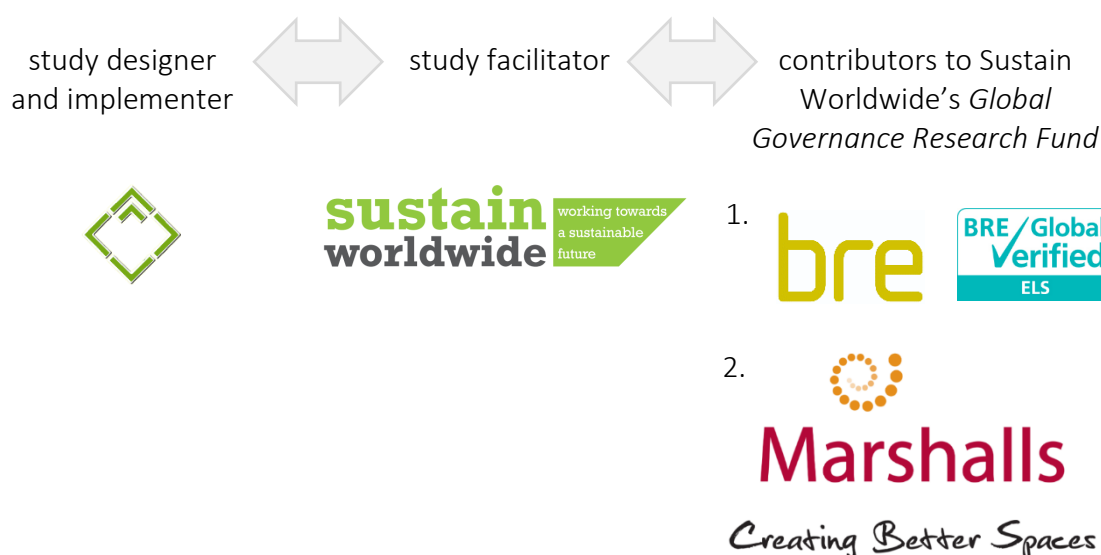


Figure 24: Real Estate 100, combined compliance, conformance and AS/AHT good practice score distribution



Acknowledgements

This study was made possible through the *Global Governance Research Fund* facilitated by Sustain Worldwide. Set up in 2018 to garner private sector support for the purposes of funding independent research on matters concerning corporate governance, human rights and anti-modern slavery initiatives, through the *Global Governance Research Fund* Sustain Worldwide is able to ensure that the necessary research is carried out independently and free of influence.²³



A. Study facilitator



We applaud Sustain Worldwide for launching the *Global Governance Research Fund* and for welcoming financial contributions by data users, practitioners and other stakeholders for the explicit purpose of funding this type of

independent research. We are furthermore most thankful to Sustain Worldwide for then commissioning this report and the production of the Global Governance FTSE 100 and Real Estate 100 League Tables.

B. Early contributors to Sustain Worldwide's *Global Governance Research Fund*



We are furthermore grateful to Dr Shamir Ghumra, BREEAM Director at BRE, for his strong advocacy in this space, authoring this report's Foreword, and supporting Sustain Worldwide's *Global Governance Research Fund*.

²³ For more information on the GGRF, please contact [Gordon Miller at Sustain Worldwide](#).



We also wish to thank Marshalls Plc, and in particular Chris Harrop, Group Marketing and Sustainability Director, for your early support to Sustain Worldwide's *Global Governance Research Fund*.

C. Study designers and implementers

Michael Margherita, ESQ, assessed, with much care, the organisations' statements. Gisella Vogel worked Orbis, and Jiahua (Java) Xu prepared the graphs and scorecards. This study was designed and this report was authored by Dr. Chris Bayer and Michael Margherita of Development International e.V.

D. TISC leaders

There are numerable people who believed in – and contributed to – the passage of the Transparency in Supply Chains (TISC) legislation, first in California in 2010, and then in the U.K. in 2015. Yet two champions of this legal theory merit special recognition: Julia Ormond of [ASSET](#), and Andrew Wallis OBE, CEO of [Unseen](#). We look to their past and future leadership to guide practitioners and stakeholders alike on this serious matter.

Appendix A: Acronyms

AS	Anti-Slavery
AS/AHT	Anti-Slavery / Anti-Human Trafficking
DI	Development International e.V.
ELS	Ethical Labour Sourcing Standard
FTSE	Financial Times Stock Exchange
GBP	Great Britain Pounds
IVR	Interactive Voice Response
KPI(s)	Key Performance Indicator(s)
LLP	Limited Liability Partnership
MS	Modern Slavery
MSA	Modern Slavery Act (U.K.)
PLC	Public Limited Company
TISC	Transparency in Supply Chains
RE	Real Estate
URL	Uniform Resource Locator
USD	United States Dollars

Appendix B: Organisations Assessed

1. FTSE 100

3I GROUP PLC	LEGAL & GENERAL GROUP PLC
ADMIRAL GROUP PLC	LLOYDS BANKING GROUP PLC
ANGLO AMERICAN PLC	LONDON STOCK EXCHANGE GROUP PLC
ANTOFAGASTA PLC	MARKS AND SPENCER GROUP P.L.C.
ASHTED GROUP PUBLIC LIMITED COMPANY	MELROSE INDUSTRIES PLC
ASSOCIATED BRITISH FOODS PLC	MICRO FOCUS INTERNATIONAL PLC
ASTRAZENECA PLC	MONDI PLC
AVIVA PLC	NATIONAL GRID PLC
BAE SYSTEMS PLC	NEXT PLC
BARCLAYS PLC	NMC HEALTH PLC
BARRATT DEVELOPMENTS PLC	OCADO GROUP PLC
BERKELEY GROUP HOLDINGS PLC (THE)	PADDY POWER BETFAIR PLC
BHP BILLITON PLC	PEARSON PLC
BP PLC	PERSIMMON PLC
BRITISH AMERICAN TOBACCO P.L.C.	PRUDENTIAL PLC
BRITISH LAND COMPANY PUBLIC LIMITED COMPANY(THE)	RANDGOLD RESOURCES LIMITED
BT GROUP PLC	RECKITT BENCKISER GROUP PLC
BUNZL PUBLIC LIMITED COMPANY	RELX PLC
BURBERRY GROUP PLC	RENTOKIL INITIAL PLC
CARNIVAL PLC	RIGHTMOVE PLC
CENTRICA PLC	RIO TINTO PLC
COCA-COLA HBC AG	ROLLS-ROYCE HOLDINGS PLC
COMPASS GROUP PLC	ROYAL BANK of SCOTLAND GROUP PLC (THE)
CRH PLC	ROYAL DUTCH SHELL PLC (RDS 'A')
CRODA INTERNATIONAL PUBLIC LIMITED COMPANY	ROYAL DUTCH SHELL PLC (RDS 'B')
DCC PUBLIC LIMITED COMPANY	ROYAL MAIL PLC
DIAGEO PLC	RSA INSURANCE GROUP PLC
DIRECT LINE INSURANCE GROUP PLC	SCHRODERS PLC
DS SMITH PLC	SCOTTISH MORTGAGE INVESTMENT TRUST PLC
EASYJET PLC	SEGO PLC
EVRAZ PLC	SEVERN TRENT PLC
EXPERIAN PLC	SHIRE PLC
FERGUSON PLC	SKY PLC
FRESNILLO PLC	SMITH & NEPHEW PLC
GLAXOSMITHKLINE PLC	SMITHS GROUP PLC

GLENCORE PLC	SMURFIT KAPPA GROUP PLC
GVC HOLDINGS PLC	SSE PLC
HALMA PUBLIC LIMITED COMPANY	ST. JAMES'S PLACE PLC
HARGREAVES LANSDOWN PLC	STANDARD CHARTERED PLC
HSBC HOLDINGS PLC	STANDARD LIFE ABERDEEN PLC
IMPERIAL BRANDS PLC	TAYLOR WIMPEY PLC
INFORMA PLC	TESCO PLC
INTERCONTINENTAL HOTELS GROUP PLC	THE SAGE GROUP PLC.
INTERNATIONAL CONSOLIDATED AIRLINES GROUP S.A.	TUI AG
INTERTEK GROUP PLC	UNILEVER PLC
ITV PLC	UNITED UTILITIES GROUP PLC
J SAINSBURY PLC	VODAFONE GROUP PLC
JOHNSON MATTHEY PLC	WHITBREAD PLC
JUST EAT PLC	WM MORRISON SUPERMARKETS PLC
KINGFISHER PLC	WPP PLC
LAND SECURITIES GROUP PLC	

2. Real Estate 100 (n=67, excluding governmental entities)

AMERICAN SUGAR HOLDINGS	JOHN LEWIS PARTNERSHIP TRUST
AMERIPRISE FINANCIAL	LANCER PROPERTY HOLDINGS
AVIVA	LAND SECURITIES GROUP
BANCO SANTANDER	LEGAL & GENERAL GROUP
BARCLAYS	LONDON AND AMSTERDAM TRUST COMPANY
BARNETT WADDINGHAM	LONDON AND QUADRANT HOUSING TRUST
BERKELEY GROUP HOLDINGS	MOUNT EDEN LAND
BESTWAY (HOLDINGS)	NATIONAL GRID
BIG YELLOW GROUP	NETWORK RAIL
BNP PARIBAS	ODDO ET COMPAGNIE
BRITISH LAND COMPANY	PRUDENTIAL
BT PENSION SCHEME	ROUNDWOOD HOLDINGS
CADOGAN SETTLED ESTATES SHAREHOLDING COMPANY	ROYAL LONDON MUTUAL INSURANCE SOCIETY
CANAL AND RIVER TRUST	ROYAL MAIL
CANARY WHARF GROUP INVESTMENT HOLDINGS	SEGRO
CANNETH BM (SHAREHOLDER)	SHAFTESBURY
CAR GIANT	SHURGARD EUROPEAN HOLDINGS
CARETOWN	ST JAMES'S PLACE
CIP PROPERTY (AIPT)	STANDARD LIFE SHARE ACCOUNT
CLS HOLDINGS	STATE STREET CORP
COAL PENSION PROPERTIES	STICHTING INGKA FOUNDATION
DAEJAN HOLDINGS	STRAND NOMINEES
DERWENT LONDON	TESCO
DIAGEO PENSION TRUST (PROPERTY CUSTODIAN)	THE PORTMAN ESTATE NOMINEES (ONE)
EUROCLEAR	THE QUEEN'S MOST EXCELLENT MAJESTY IN RIGHT OF HER CROWN
FCP TOPCO	THE WARDENS AND COMMONALTY OF THE MYSTERY OF GOLDSMITHS OF THE CITY OF LONDON
FORD MOTOR COMPANY	THE WHITGIFT FOUNDATION
GREATER LONDON AUTHORITY	TRANSPORT FOR LONDON
GROSVENOR (MAYFAIR) ESTATE	TRUSTEES OF LAZARI FAMILY TRUST
GROSVENOR GROUP	UNIVERSITIES SUPERANNUATION SCHEME
HAMMERSON	WALMART STORES
HOWARD DE WALDEN ESTATES HOLDINGS	WGTC NOMINEES
HSBC HOLDINGS	ZURICH INSURANCE GROUP
JERMYN STREET COM REAL ESTATE FUND 3	

Appendix C: Evaluation Instrument

rubric	indicator	answer	indicator type	indicator weight	indicator #	
legal compliance	Included a link to the slavery and human trafficking statement on website's homepage?	yes / no	compl.	4	1	
	Signed by director (corp), designated member (LLP), or partner (partnerships)	yes / no	compl.	2	2	
	Approved by the board of directors or equivalent management body [except LLPs]	yes / no	compl.	4	3	
	Explanation of steps organisation has or has not taken to ensure slavery and human trafficking is not taking place:	a) in any of its supply chains	yes / no	compl.	1	4
		b) in any part of its own business	yes / no	compl.	1	5
	Does the statement:	include a defined fiscal year period , which the contents of the statement are meant to cover?	yes / no	compl.	4	6
		comply with the annual publication requirement of the MSA?	yes / no	compl.	3	7
		identify which individual company(ies) is/are covered under the statement?	yes / no	compl.	4	8
		make clear it is pursuant to the MSA?	yes / no	compl.	2	9
	disclosure conformance, AS/AHT good practice	basics (a) information the organisation's structure , its business and its supply chains ;	Does the organisation provide information about its: STRUCTURE	yes / no	conf.	1
Does the organisation provide information about its: BUSINESS			yes / no	conf.	1	11
Does the organisation provide information about its: (1) supply/service chains OR (2) goods / services it procures directly for its operations (e.g. equipment, vehicles, etc.)			yes / no	conf.	2	12
Supply/ service chains mapped down to level of raw materials or sub-contracting -- and provided examples			yes / no	good practice	2	13

		in statement?				
		Included visual diagram (e.g. charts/ maps) of supply/ service chain OR business activities ?	yes / no	good practice	3	14
policy	(b) information about its policies in relation to slavery and human trafficking;	1. Does the organisation have a distinct AS policy for their business ? <i>OR</i> 2. Has the organisation incorporated AS-specific principles into their existing policies ?	yes / no	conf.	3	15
		Policy implementation in particular by incorporating policy into supplier/ service provider contract clauses	yes / no	good practice	3	16
		Policy enforcement (consequences for non-performance including suspension or dismissal of offending suppliers / providers)	yes / no	good practice	2	17
		Requires enforcement of " employer pays " principle?	yes / no	good practice	1	18
		Does the organisation provide information about its due diligence processes in relation to Modern Slavery in its: BUSINESS	yes / no	conf.	2	19
due diligence	(c) information about its due diligence processes in relation to slavery and human trafficking in its business and supply chains:	Does the organisation provide information about its due diligence processes in relation to Modern Slavery in its: SUPPLY/SERVICE CHAINS (including clients, procurement)	yes / no	conf.	2	20
		Due diligence standard referenced?	yes / no	good practice	1	21
		Prospective business activities (e.g. hiring employees) evaluated based on AS criteria?	yes / no	good practice	2	22
		Prospective suppliers/ providers evaluated/ screened based on AS criteria?	yes / no	good practice	2	23
		Does the organisation provide information about the parts of its BUSINESS where there is a risk of Modern Slavery taking place?	yes / no	conf.	1	24
modern slavery risk: parts, assessment, and management	(d) Information about the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps	Does the organisation provide information about the parts of its SUPPLY/SERVICE CHAINS (e.g. procurement) where there is a risk of	yes / no	conf.	1	25

	it has taken to assess and manage that risk;	Modern Slavery taking place?				
		Modern Slavery risks in business described?	yes / no	good practice	2	26
		Modern Slavery risks in supply/ service chains described?	yes / no	good practice	2	27
		Does the organisation describe steps it has taken to ASSESS the risk of Modern Slavery in its BUSINESS ?	yes / no	conf.	1	28
		Does the organisation describe steps it has taken to MANAGE the risk of Modern Slavery in its BUSINESS ?	yes / no	conf.	1	29
		Does the organisation describe steps it has taken to ASSESS the risk of Modern Slavery in its SUPPLY/ SERVICE CHAINS (e.g. procurement)?	yes / no	conf.	1	30
		Does the organisation describe steps it has taken to MANAGE the risk of Modern Slavery in its SUPPLY/ SERVICE CHAINS (e.g. procurement)?	yes / no	conf.	1	31
		Metrics (KPIs) for business risk assessment discussed? (e.g. frequency of risk assessment, % assessed)	yes / no	good practice	2	32
		Metrics (KPIs) for supplier/provider risk assessment discussed? (e.g. frequency of risk assessment, % of suppliers assessed)	yes / no	good practice	2	33
		audits		Audits of business activities performed?	yes / no	good practice
Metrics (KPIs) for business audits discussed? (e.g. frequency of audits)	yes / no			good practice	2	35
Audits of suppliers/ providers performed?	yes / no			good practice	2	36
Metrics (KPIs) for supplier/ provider audits discussed? (e.g. frequency of audits)	yes / no			good practice	2	37
Site visits and/or spot checks at supplier/ provider sites further down the supply/ service chains?	yes / no			good practice	1	38
grievance mechanism / ethics hotline		Does the organisation maintain a whistleblower mechanism or ethics hotline within its own business ?	yes / no	good practice	2	39
		Does the organisation maintain a worker-level incident detection and reporting system or whistleblower mechanism for its supply/service chains (e.g. operational- level)?	yes / no	good practice	3	40
t i y	(e) Information	Does the organisation provide	yes	conf.	5	41

	about its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against performance indicators	information about its effectiveness in eliminating Modern Slavery from its business or supply chains, measured against such performance indicators as it considers appropriate?	/ no			
		Year-over-year improvement / change measured based on the selected KPIs?	yes / no	good practice	3	42
		Remediation of specific incidents / cases discussed?	yes / no	good practice	3	43
training	(f) Information about the training about slavery and human trafficking available to its staff.	1. Does the organisation have a distinct MS training programme for their business? <i>OR</i> 2. Has the organisation incorporated MS-specific training into their existing training programme?	yes / no	conf.	3	44
		Appropriate training delivered to the relevant parties within the company (e.g. procurement, management, legal, etc.)?	yes / no	good practice	2	45
		Company also offered training to high-spend or high-risk tier 1 suppliers / providers?	yes / no	good practice	3	46
		AS / AHT training done by 3rd party?	yes / no	good practice	1	47

GLOBAL GOVERNANCE — FTSE 100 and Real Estate 100 — 2017/18
Compliance and Conformance with U.K. MSA and Good Practice in Human Rights

3I GROUP PLC

Industry: FINANCE/INSURANCE Revenue: USD 2,261 mn Revenue year: 2017 [URL to disclosure](#)

• YES
• NO

Compliance

- 1. URL on homepage 21/25 (84%)
- 2. signed ••
- 3. approved ••
- 4. (no) AS/AHT steps in value chains ••
- 5. (no) AS/AHT steps in own business ••
- 6. fiscal year period ••
- 7. annual publication ••
- 8. organisations covered by statement ••
- 9. statement pursuant to UK MSA ••

Conformance

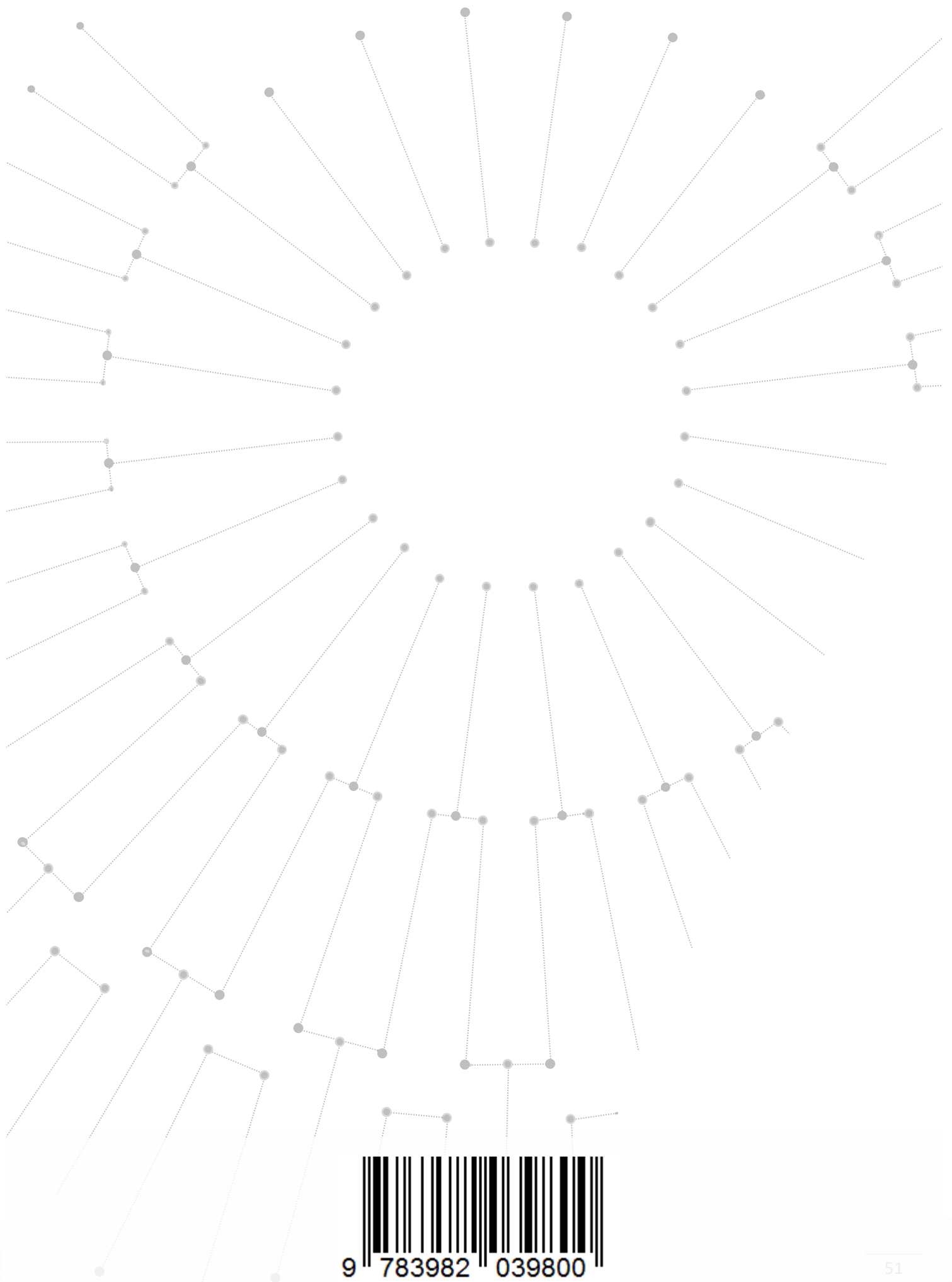
- 10. information on structure 10/25 (40%)
- 11. information on business ••
- 12. information on value chain(s)/procurement ••
- 20. information on policies ••
- 29. internal due diligence ••
- 30. external due diligence ••
- 13. internal parts with MS risk ••
- 14. external parts with MS risk ••
- 18. assessed internal risk ••
- 21. managed internal risk ••
- 22. assessed external risk ••
- 23. managed external risk ••
- 39. information on effectiveness ••
- 43. information on training ••

AS/AHT good practice

- 15. value chains mapped 5/50 (10%)
- 19. visual diagram ••
- 24. policy implementation ••
- 25. policy enforcement ••
- 28. employer pays ••
- 31. due diligence standard(s) ••
- 41. prospective partners assessed ••
- 44. prospective business assessed ••
- 16. risks in business described ••
- 17. risks in value chains described ••
- 26. risk assessment KPIs, internal ••
- 27. risk assessment KPIs, external ••
- 32. audits of own business ••
- 33. audit metrics for own business ••
- 34. supplier/provider audits ••
- 35. audit metrics for business partners ••
- 36. site visits/spot checks ••
- 37. whistleblower channel, workers ••
- 38. whistleblower channel, business ••
- 40. year-over-year change ••
- 42. remediation of cases ••
- 45. in-house training ••
- 46. external training ••
- 47. 3rd party training ••

Combined score: 36/100

For full indicators and explanations see full report at: <https://www.developmentinternational.org/>.



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