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**MODERN SLAVERY  
ACTIONS:  
ROLES AND  
RESPONSIBILITIES**



# Modern Slavery Actions: Roles and Responsibilities

The chart below summarises the roles and responsibilities employees/decision-makers play in addressing modern slavery compliance and risk within supply chains. This includes both company/brand and factory employees. Note that the employee names and roles may differ from organisation to organisation. Refer to the definitions below for more details:

- **Board Member:** A member of a governing board who jointly supervises the activities of an organisation.
- **C-Suite:** Executive-level managers within a company. Common C-suite executives include chief executive officer (CEO), chief financial officer (CFO), chief operating officer (COO), and chief information officer (CIO).
- **Company Director:** Senior management staff of a large company who are given a significant portfolio to manage.
- **Legal Counsel:** A person legally appointed or empowered to act for a company.
- **Corporate Social Responsibility (CSR) Manager:** A manager who is responsible for defining and developing the strategies that underpin a company's CSR objectives.
- **Environmental, Social and Governance (ESG) Manager:** A manager who is responsible for defining and developing the strategies that underpin a company's ESG objectives.
- **Vendor Compliance Manager:** A manager who acts as an interface with a company's audit department to perform periodic compliance audits and linking it with the company products-related vendors.
- **Corporate Compliance Manager:** A manager who is responsible for ensuring that a company's policies and procedures comply with regulatory and ethical standards.
- **Human Resource Manager:** A manager who plans, directs and coordinates the administrative functions of an organisation. They oversee recruiting, interviewing and hiring of new staff as well as training for current staff.
- **Supply Chain Auditor:** A specialist who reviews the records, accounts, processes and procedures of companies and organisations to ensure the validity and legality of their financial and supply chain records, processes and procedures. Their role is to identify potential risks or issues that might exist within a supply chain.
- **Business Owner (factory):** A person involved in the ownership or management of an industrial enterprise.
- **Business Manager (factory):** A manager who oversees the workers and the equipment they operate on the factory floor. They are responsible for contributing to and carrying out production strategy decisions.
- **Business Supervisor (factory):** A person who supervises and coordinates the activities of production and operating workers.

Understanding the roles and responsibilities related to each category can help companies/brands and factories to better plan awareness-raising and training requirements. It also helps them to better understand who is responsible for overseeing policies, risk assessment, compliance actions, and remediation. This tool demonstrates the interrelatedness of different roles and responsibilities within an organisation:

## Modern Slavery Actions: Roles and Responsibilities

	Company/Brand										Supplier			Sub-Supplier		
	Board Member	C-Suite	Director	Legal	CSR	ESG	Vendor Compliance	Corporate Compliance	HR	Audit	Owner	Manager	Supervisor	Owner	Manager	Supervisor
Establishing and maintaining modern slavery policies and procedures	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	
Ensuring purchasing practices include modern slavery risk factors				✓			✓	✓		✓		✓			✓	
Developing and implementing direct and indirect hire responsible recruitment policies				✓			✓	✓	✓		✓	✓		✓	✓	
Supply chain mapping							✓	✓		✓		✓			✓	
Training brand employees on modern slavery					✓				✓			✓			✓	
Training suppliers on modern slavery					✓		✓		✓			✓			✓	
Developing and implementing a remediation plan			✓	✓	✓		✓	✓		✓		✓	✓		✓	✓
Providing grievance mechanisms to workers (e.g. phone apps, third-party hotlines)				✓	✓			✓			✓	✓	✓	✓	✓	✓
Managing grievances raised			✓	✓	✓			✓			✓	✓	✓	✓	✓	✓
Ensuring that information on modern slavery concerns reaches the C-suite level			✓	✓			✓	✓								
Monitoring the effectiveness/impact of remediation decisions	✓	✓	✓	✓			✓	✓		✓		✓	✓		✓	✓
Training and capacity development programs for sub-suppliers					✓		✓					✓			✓	
Communicating modern slavery policy to suppliers' own suppliers (2nd, 3rd tier etc.)												✓	✓		✓	✓

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	Board Member	C-Suite	Director	Legal	CSR	ESG	Vendor Compliance	Corporate Compliance	HR	Audit	Owner	Manager	Supervisor	Owner	Manager	Supervisor
Joining multi-stakeholder anti-slavery initiatives			✓	✓	✓	✓	✓	✓	✓							
External reporting on anti-slavery policies and strategies				✓	✓	✓	✓	✓								
Auditing to verify:							✓	✓		✓		✓			✓	
• Workers have written employment contracts in a language they understand							✓	✓		✓		✓			✓	
• Worker contracts have not been substituted at source or destination							✓	✓		✓		✓			✓	
• Worker contracts are compliant with local labour laws and corporate policies							✓	✓		✓		✓			✓	
• Legal and industrial limits on working hours are observed							✓	✓		✓		✓			✓	
• All deductions are included in the contract within legal or industrial regulations							✓	✓		✓		✓			✓	
• Withholding of wages is not tolerated							✓	✓		✓		✓			✓	
• There are no restrictions on freedom of movement							✓	✓		✓		✓			✓	
• Recruitment and brokerage fees paid by workers are within legal limits							✓	✓		✓		✓			✓	


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	Board Member	C-Suite	Director	Legal	CSR	ESG	Vendor Compliance	Corporate Compliance	HR	Audit	Owner	Manager	Supervisor	Owner	Manager	Supervisor
<ul style="list-style-type: none"> <li>Workers retain copies of their identification documents, or have unencumbered access to their documents</li> </ul>							✓	✓		✓		✓			✓	
<ul style="list-style-type: none"> <li>There is no overcharging or any other method that leads to worker dependence and denial of choice</li> </ul>							✓	✓		✓		✓			✓	



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