

WORKSHOP HANDOUT

Human Rights, Value Chains and Business Responsibility: Tackling Forced Labour Risks





Human rights, value chains and business responsibility: Tackling forced labour risks

Bursa Malaysia modern slavery training

Nathanael Foo

WALK FREE is an international human rights group working to end all forms of modern slavery

Modern slavery impacts every region of the world. No global supply chain is free from forced labour.

MALAYSIA

People living in modern slavery

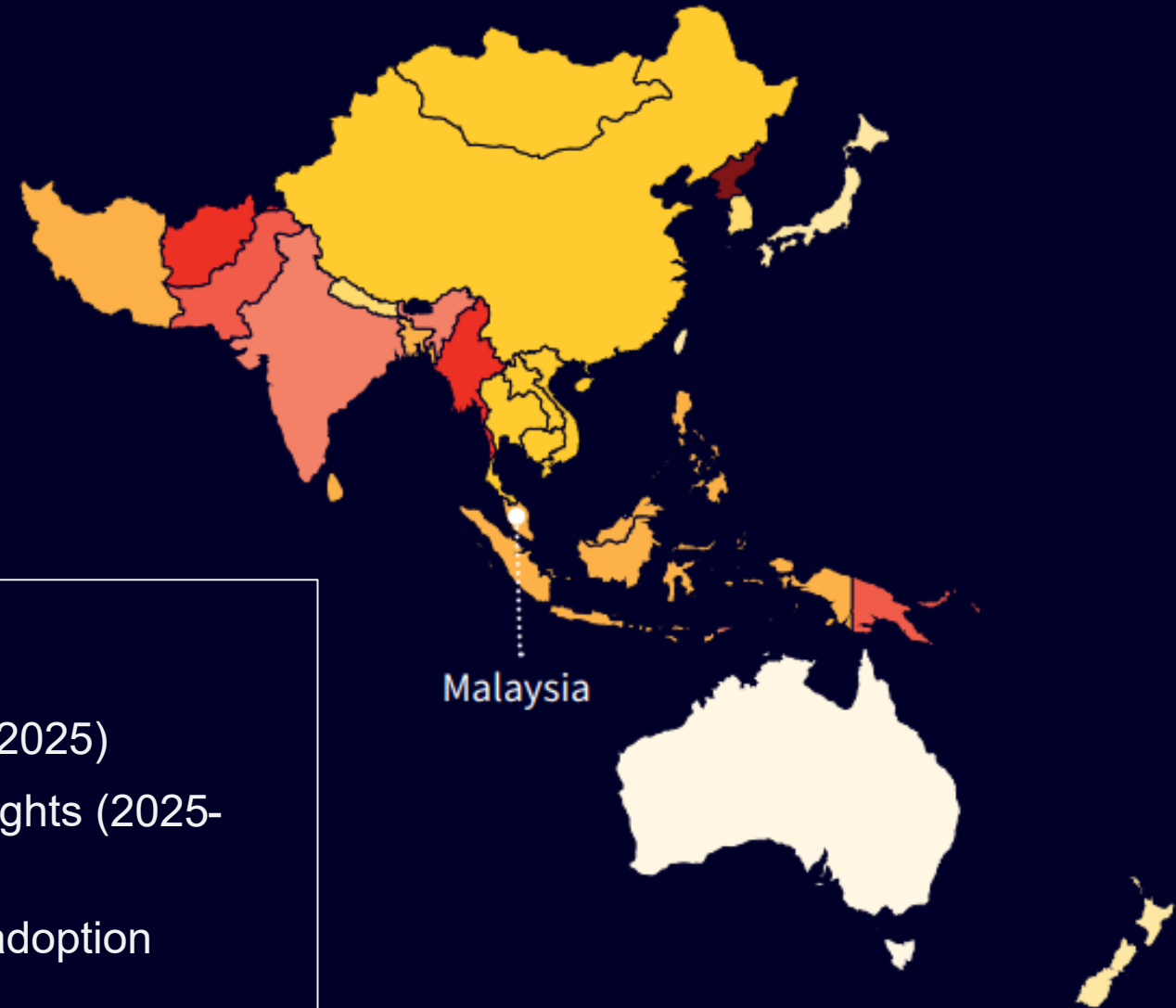
202,000

Prevalence of modern slavery (per 1000 people)

6.3

National progress

- National Action Plan for Forced Labour (2021-2025)
- National Action Plan for Business & Human Rights (2025-2030)
- National Sustainability Reporting Framework adoption



THANK YOU

**Business
and
Investor
Toolkit**



TODAY'S FACILITATORS



FIONA QUINLAN-WELLS

*Training Officer
UN SSE initiative*



NATASHA JUNG

*Sustainable Finance Analyst,
FAST Initiative, UNDP*



TIFFANY GRABSKI

*Academy Head
UN SSE initiative*



EMILY SIMS

*Senior Specialist
ILO*

GUEST SPEAKERS



ANITA LO
Director, Worker Well-Being
ESCP



ethical
supply chain
program
FOUNDED BY ICTI

Today's Workshop



2 hours



Live Q&A throughout



Participation is anonymous



Certificate requires survey

USING ZOOM

CHAT FUNCTION:

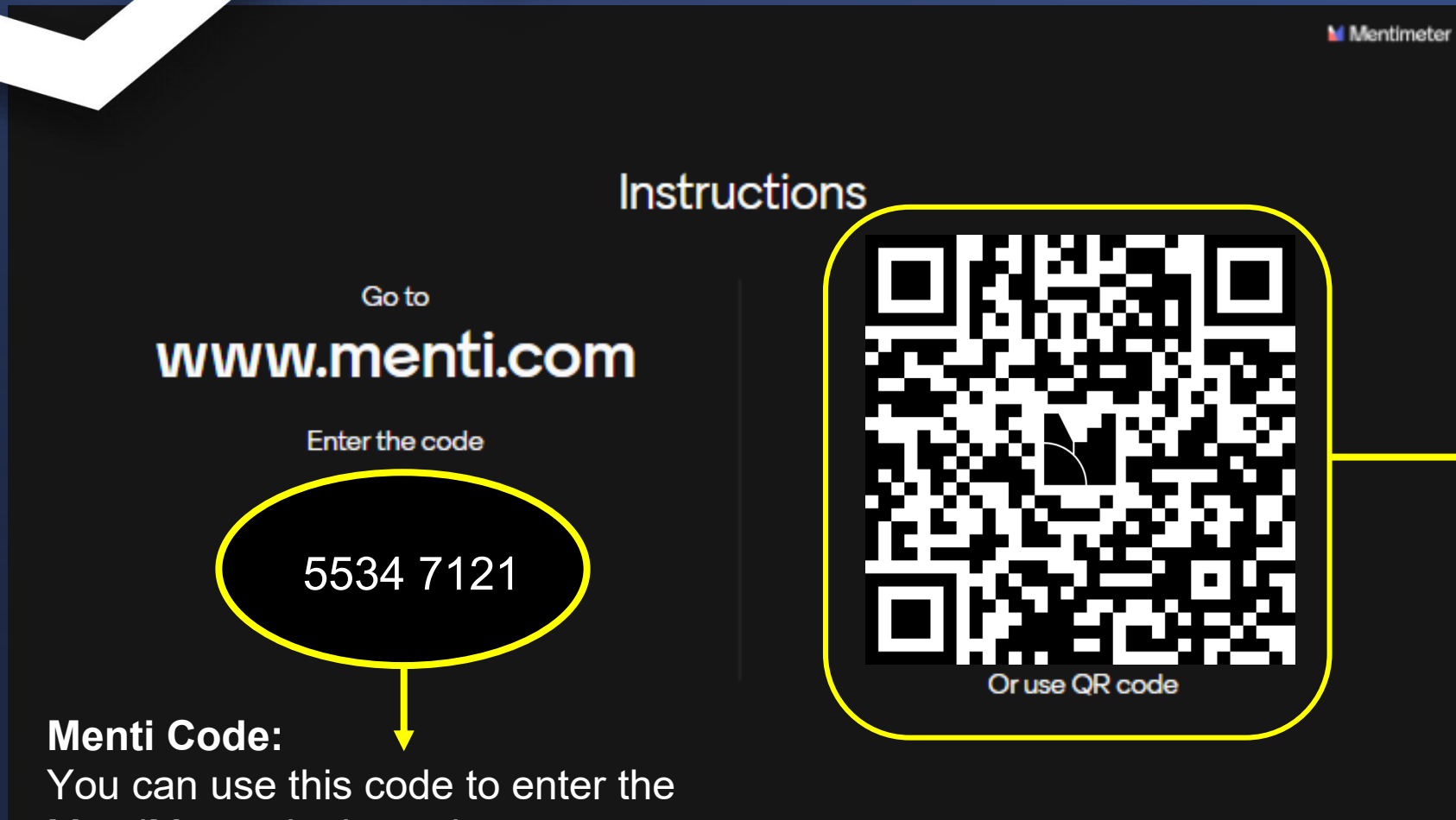
Use the chat box to introduce yourself and make comments.



Q&A BOX:

Ask any questions you might have in the Q&A box. We will answer them throughout the session.

USING MENTI



TIP:

Keep the Menti open on your phone or browser, as we will use it multiple times throughout the workshop

QR Code:

You can also join the menti via your phone using the QR code

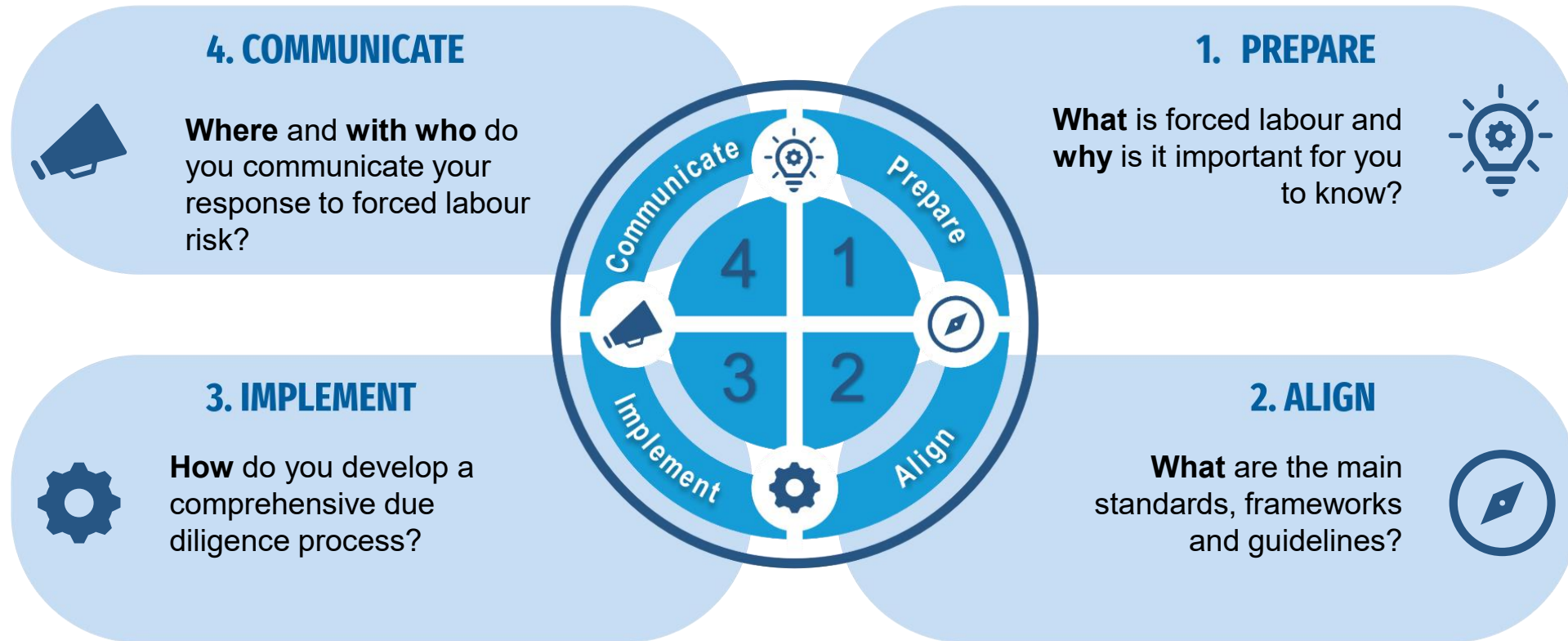
Menti Code:

You can use this code to enter the MentiMeter via the webpage www.menti.com

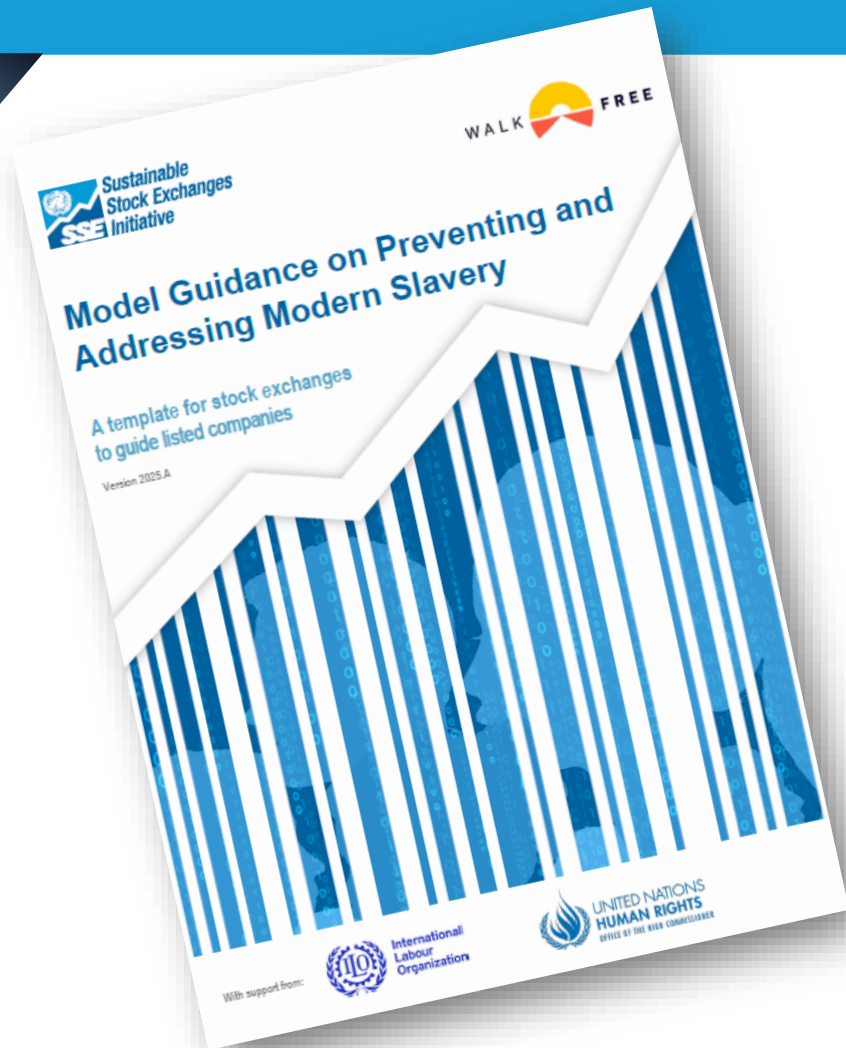
AGENDA

Topic:	
Introduction to the course and topic (15 mins)	Q&A throughout
Module 1 – Prepare (~30 mins)	
Module 2 – Align (~20 mins)	
Module 3 – Implement (~25 mins)	
Module 4 – Communicate (~25 mins)	
Wrap up (5 mins)	

Our learning journey today



Key Resource



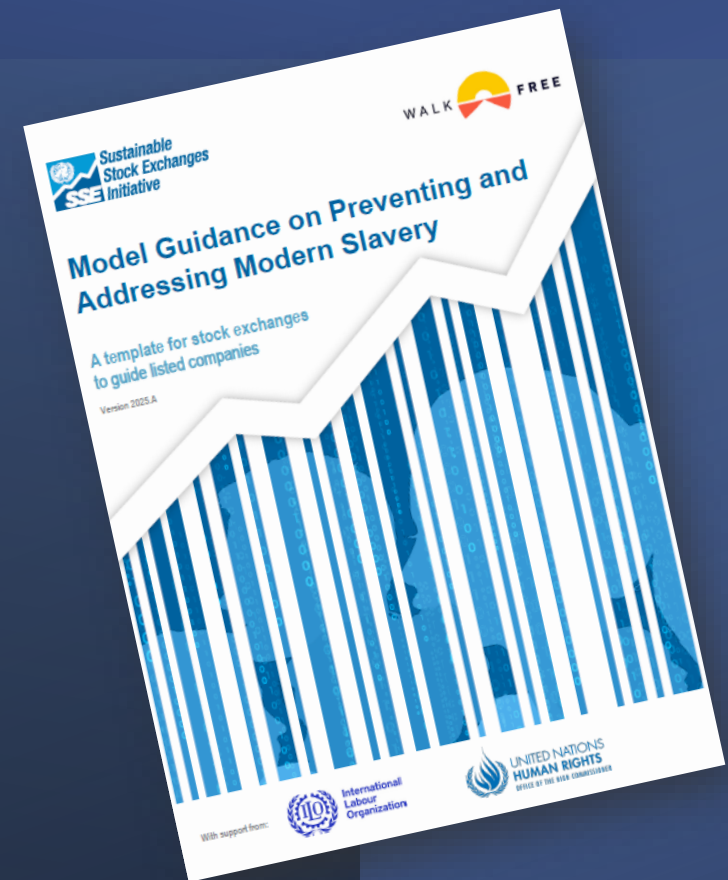
The SSE has a series of Model Guidance publications which help stock exchanges to write guidance for their markets on sustainability-related topics.

You can also use this guidance as a companion resource to this training workshop and to dive deeper into any of the topics we discuss today.

Find it on the Publication tab of the UN SSE's website

<https://sseinitiative.org/publications>

WORKSHOP MATERIALS



Find it on the SSE's webpage for this workshop

<https://sseinitiative.org/sse-academy>

GOALS



Understand the relevance of forced labour for businesses



Build familiarity with key standards and frameworks



Identify actions to take to protect from reputational and legal risks



Be able to structure effective communications for investors

Quick Quiz

1. How comfortable are you talking about Forced Labour in a work environment?

Rate your comfort level on a scale of 1-10
(1 for very uncomfortable,
10 ready to start the conversation)

A pop up box will shortly ask you to answer this question. If you do not see the quiz in zoom, you can answer in the chat box.



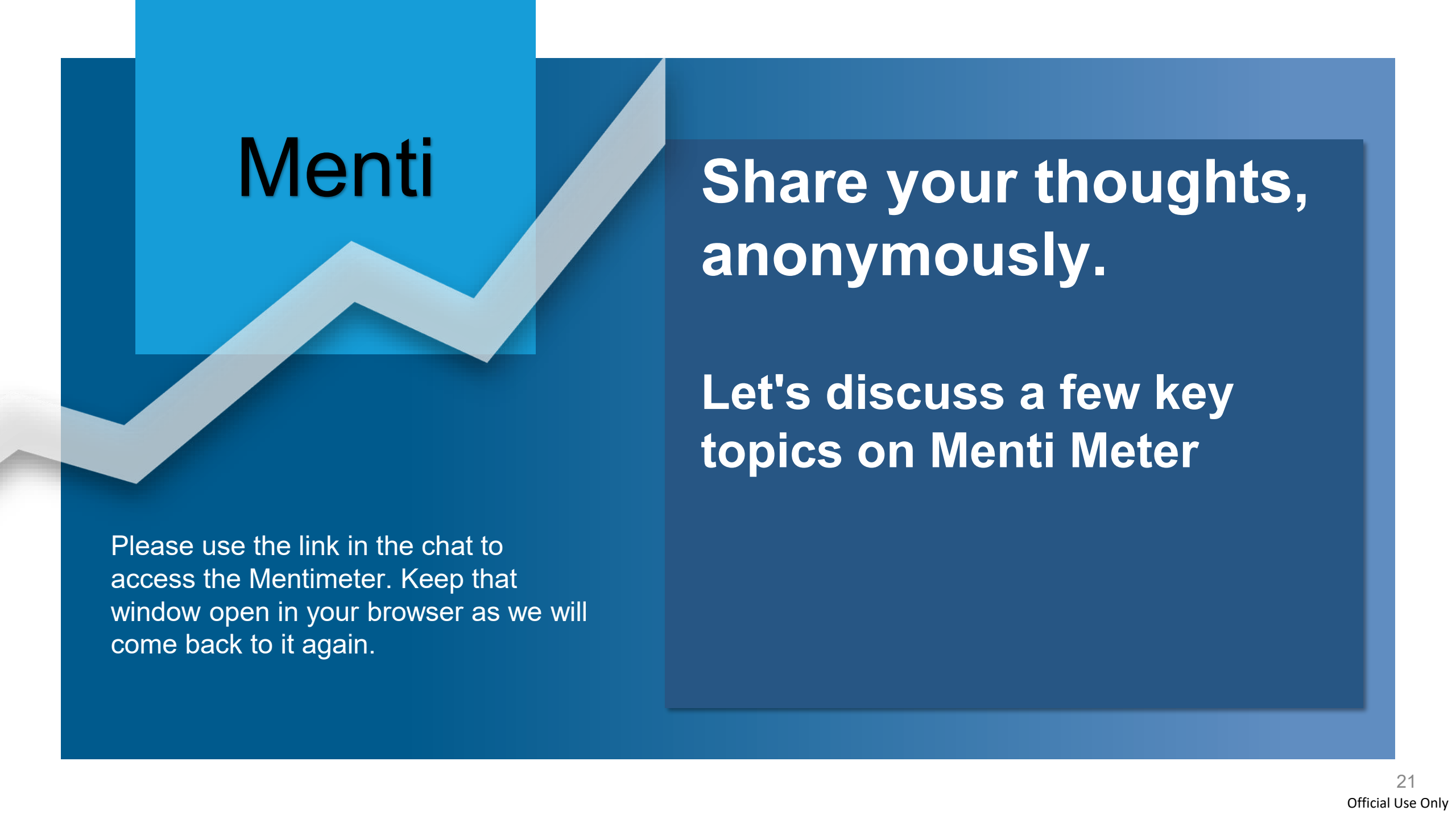
PREPARE



1. PREPARE

What is forced labour and how does it apply to your unique business?



The slide features a blue background with a white zigzag line. A light blue square is positioned in the upper left, containing the word "Menti".

Menti

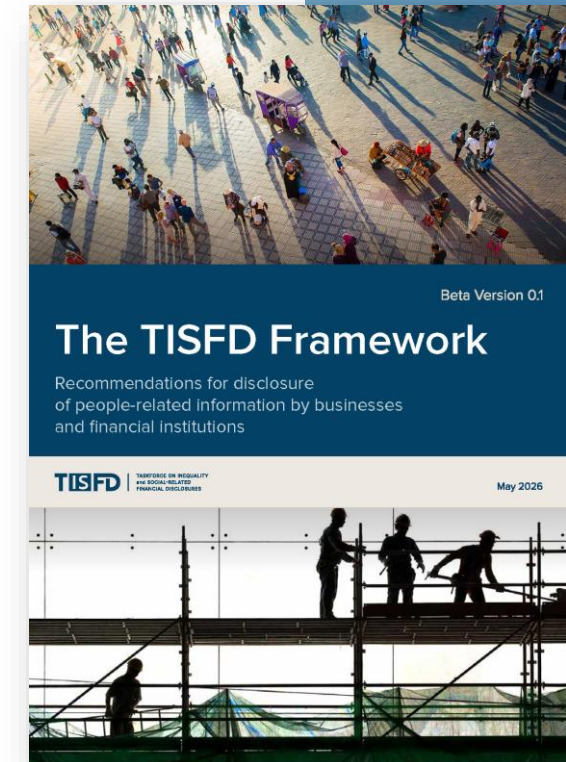
**Share your thoughts,
anonymously.**

**Let's discuss a few key
topics on Menti Meter**

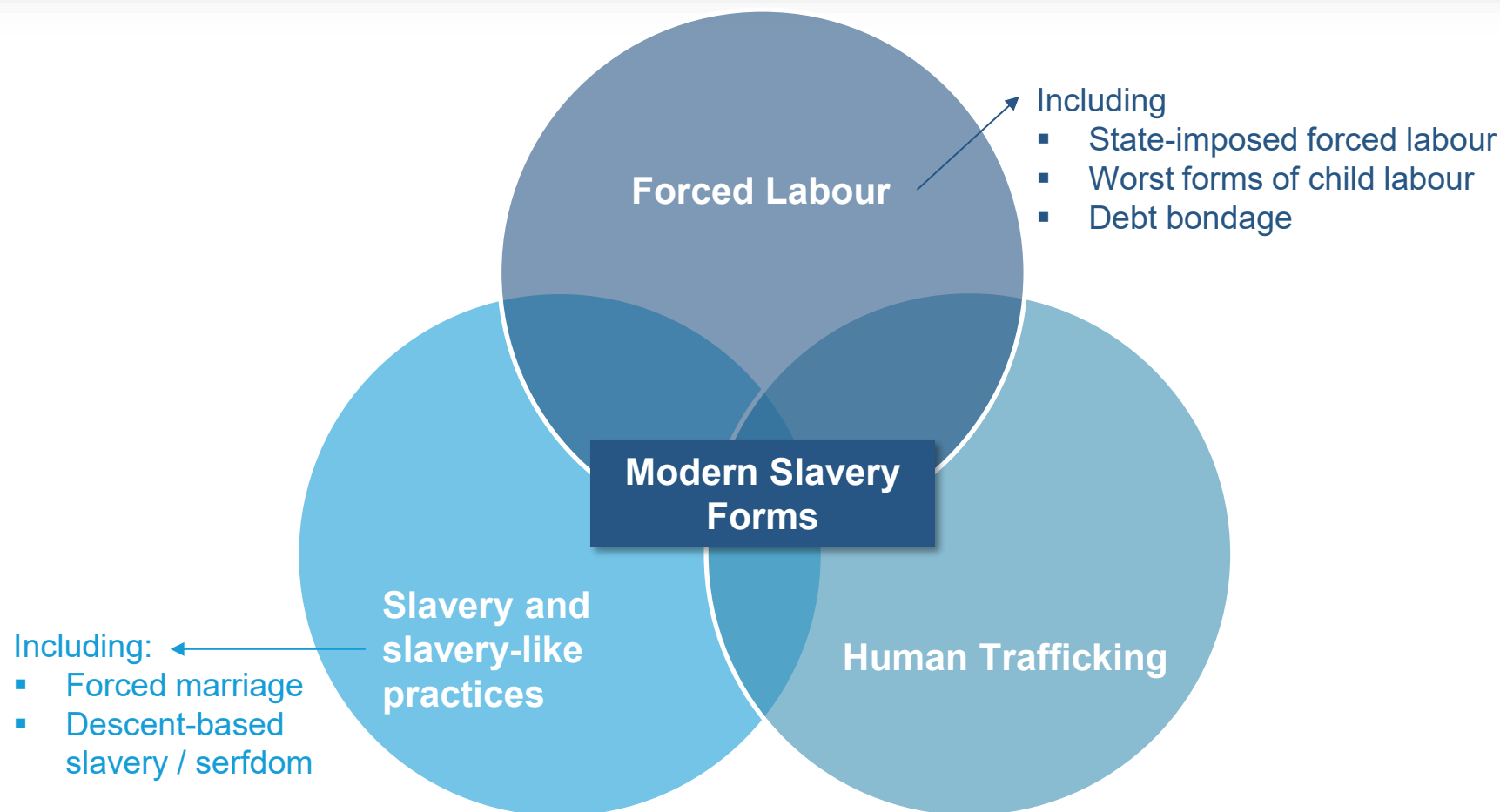
Please use the link in the chat to
access the Mentimeter. Keep that
window open in your browser as we will
come back to it again.

Handout Slide

Examples of financial effects	Opportunities		Risks	Examples of financial effects
Reduced operating costs	Opportunities arising from strengthening working conditions, community relations and resilient value chains, leading to productive and continuous operations.	Operational	Risks associated with loss, disruption or diminished performance in an entity's operations. This includes both acute risks, such as site closures, and chronic risks, such as productivity decline.	Cost premiums
Productivity gains				Recovery expenses
Cash flow predictability				Hiring costs
Reduced liability exposure	Opportunities created by anticipating and shaping policy developments, strengthening legal preparedness and enhancing regulatory trust.	Policy and legal	Risks associated with changes in policies, laws, regulations and caselaw that increase the likelihood and potential severity of contingent liabilities and the eventuality of legal claims	Fines and penalties
Lower compliance costs				Compliance spending
Access to capital				Litigation costs
Higher brand equity	Opportunities created by building a strong reputation for responsible business conduct, enhancing customer loyalty, talent attraction and stakeholder confidence.	Reputational	Risks related to changes in perceptions concerning an organisation's actual or perceived adverse impacts, undermining customer loyalty, employee retention and stakeholder trust.	Lost revenues
Reduced recruitment costs				Higher cost of capital
Higher revenues				Reduced brand equity
Access to capital	Opportunities arising from shifts in social conditions that expand market demand, strengthen labour availability and enhance long-term asset values.	Market	Risks resulting from changes in the social environment that impact supply, demand, access to (human) resources, and the value of assets.	Revenue declines
Access to skilled labor				Higher cost of capital
Increased growth potential				Lower growth potential



Forced labour – a form of modern slavery



What is forced labour?

- **ILO Forced Labour Convention (No. 29):** “For the purposes of this Convention the term forced or compulsory labour shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.”
- **Possible indicators:**
 - vulnerability,
 - deception,
 - restricted movement,
 - isolation,
 - violence or threats,
 - confiscated identity documents,
 - unpaid wages,
 - debt bondage,
 - or unsafe conditions and excessive overtime.

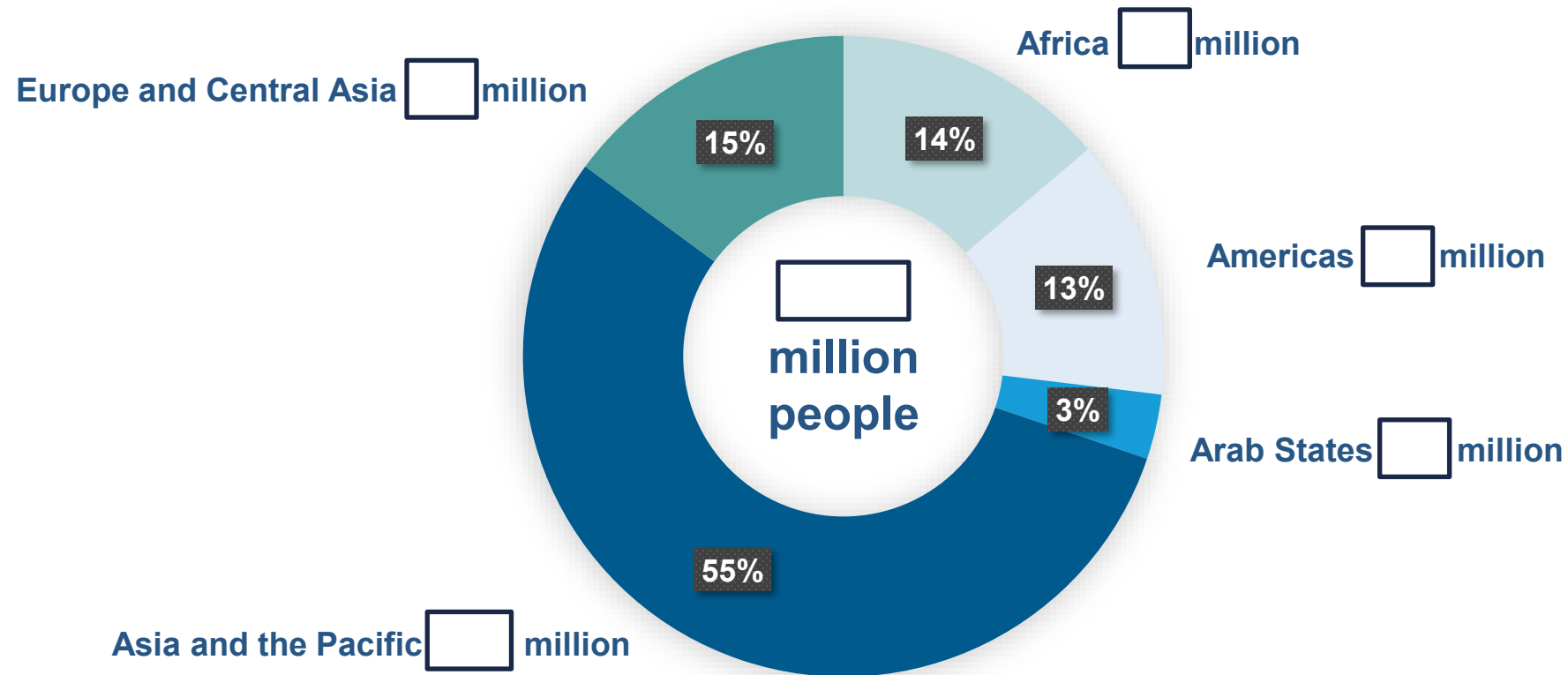
Quick Quiz

2. Which statement best reflects the scale of forced labour today?

- a) It is largely a historical issue
- b) It occurs mainly in countries with weak human rights records
- c) It occurs mainly in conflict zones
- d) The number of people subject to forced labour is growing

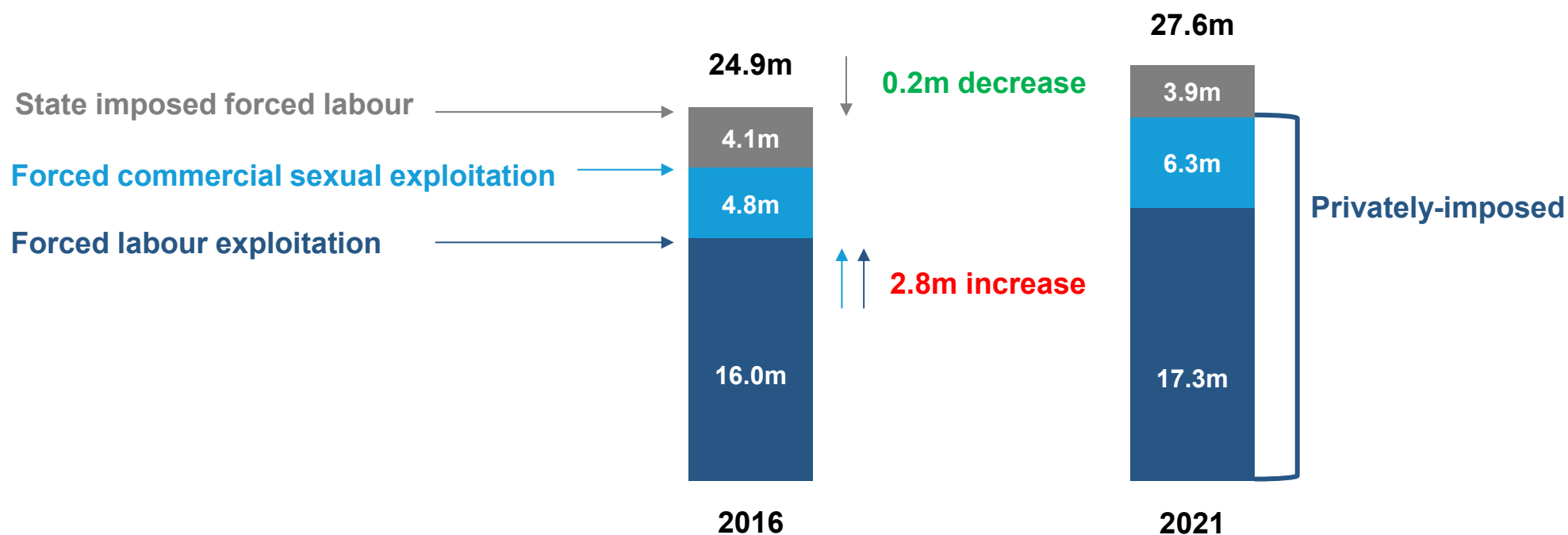
A pop up box will shortly ask you to answer this question. If you do not see the quiz in zoom, you can answer in the chat box.

Number of people in forced labour



Who is responsible?

The rise in forced labour between 2016 and 2021 was driven entirely by privately-imposed forced labour



G20 Importing Risk

(per annum)

At risk goods
imported by the G20
**US\$468
BILLION**

Electronics
**US\$243.6
BILLION**

Garments
**US\$147.9
BILLION**

Palm oil
**US\$19.7
BILLION**

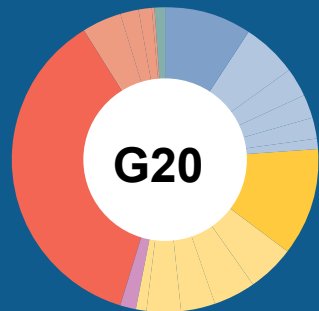
Solar panels
**US\$14.8
BILLION**

Textiles
**US\$12.7
BILLION**

Africa
\$4.8B

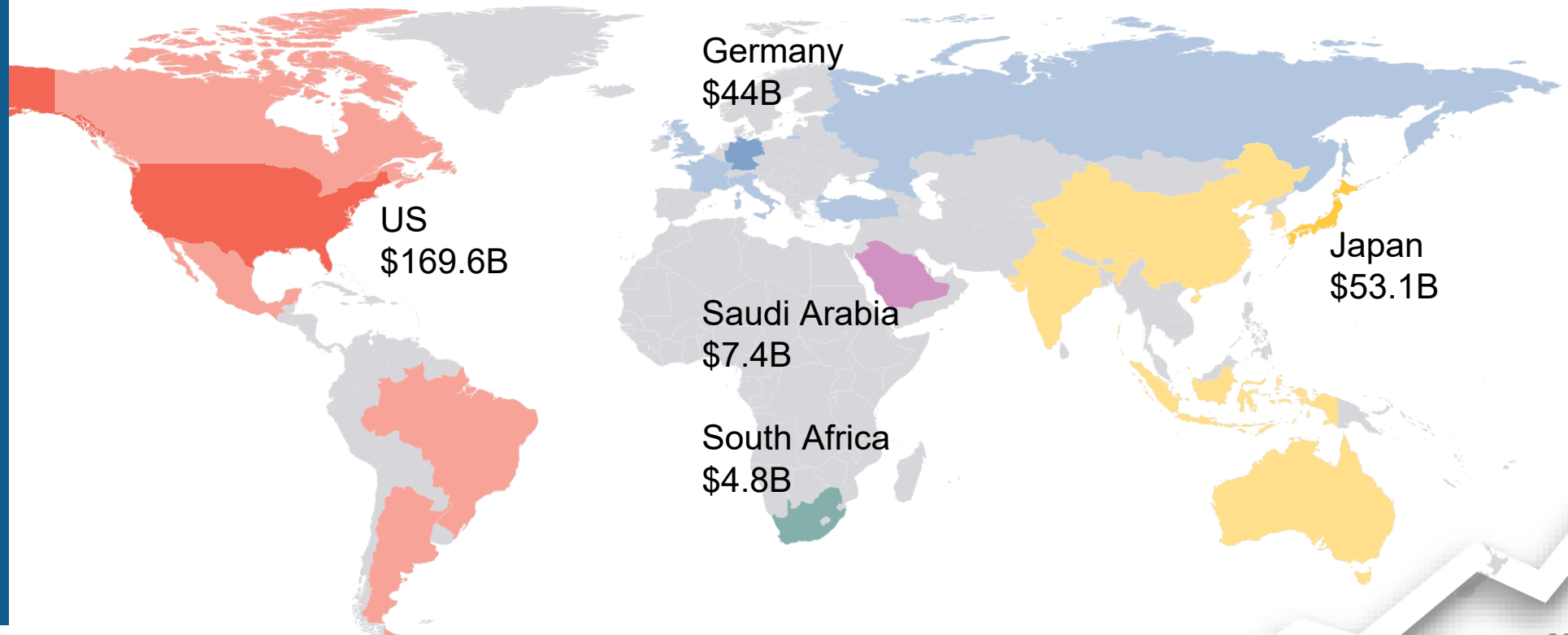
Americas
\$206B

Europe and
Central
Asia
\$113.2B



Arab
States
\$7.4B

Asia and
the Pacific
\$136.7B





PREPARE

Recap & Tips

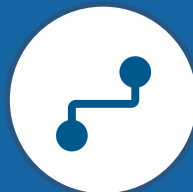


Start a conversation and share what you've learned



Contextualize

Understand your company's unique operations and partnerships



Situate

Gain a clear understanding of your supply chain to assess risk



Integrate

Understand the connections between broader sustainability or risk management topics



PREPARE

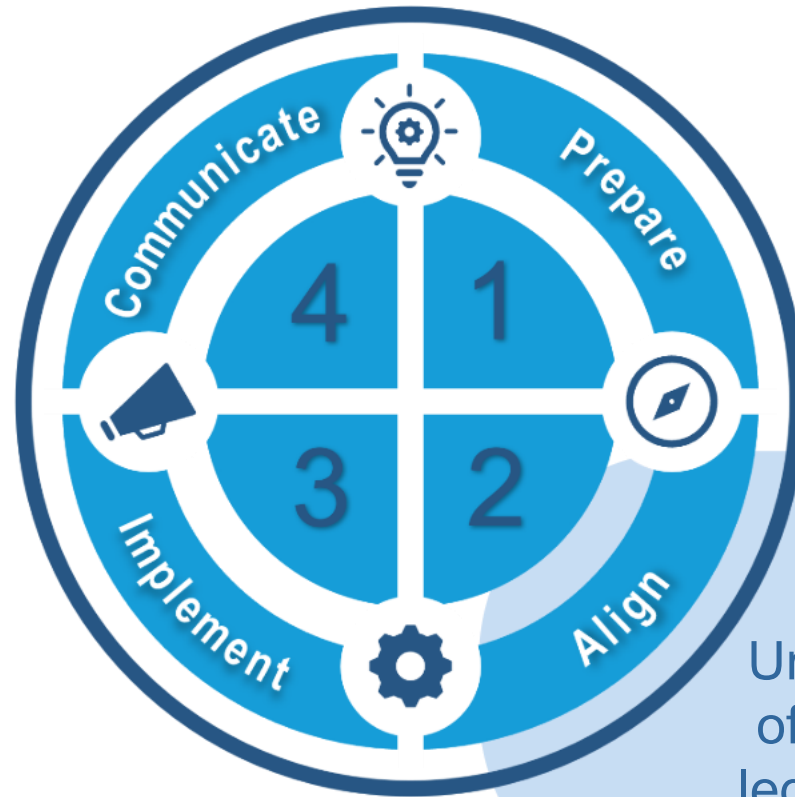
Get started!



Start a conversation and share what you've learned

Internal conversations are the start of every new policy, practice and action. Many organizations don't act because they do not have the confidence or knowledge on how to act. Get the conversation started with information conversations and investigate holding a more formal training for your organization on this topic.

ALIGN



2. ALIGN

Understand the landscape of international standards, legislation and frameworks



Quick Quiz

A pop up box will shortly ask you to answer this question. If you do not see the quiz in zoom, you can answer in the chat box.

3. When you think about aligning with standards on forced labour – what is/are your biggest challenge(s)?

- a) Understanding which standards or frameworks are most relevant for to us
- b) Translating standards into practical action
- c) Keeping up with a rapidly changing regulatory landscape
- d) Getting internal buy-in
- e) Other (please share in the chat)

Types of standards and frameworks



International standards on modern slavery

UN issue-specific treaties
human rights and ILO standards



International frameworks for responsible business conduct

UNGPs, OECD guidelines, and
SDGs



Legislation

Legislation focused
on combating
modern slavery and
other human rights risks

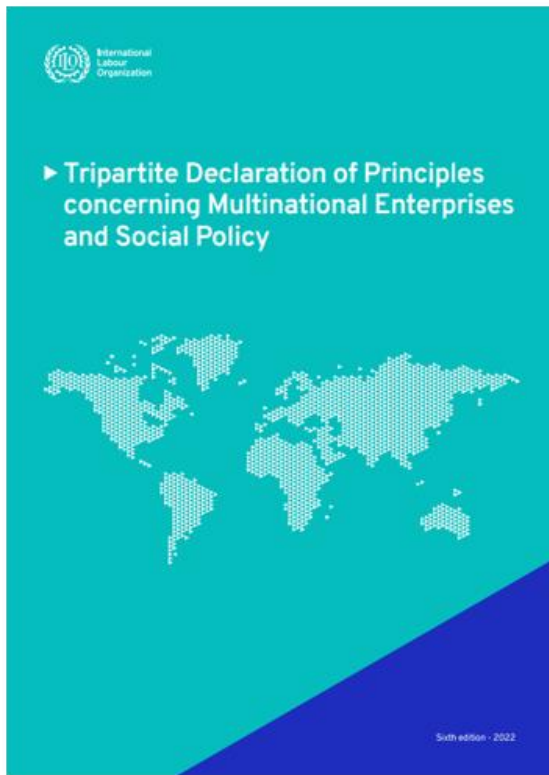


Other initiatives

Benchmarks, codes
and guidelines

Source: UN SSE

Foundation: International Labour Standards



- Origin: ILO
- International Labour Standards on forced labour:
 - Forced Labour Convention, 1930 (No. 29)—181 ratifications
 - Protocol to the Forced Labour Convention, 2014—65 ratifications
- Fundamental Principles and Rights at Work
- The ILO MNE Declaration
 - Addresses both Government and Business

Drivers of Action to combat forced labour

A circular inset image showing a close-up of a wooden gavel resting on a wooden surface, symbolizing regulation or law.

Regulation

- Transparency
- Import bans
- HRDD reporting

A circular inset image showing a large cargo ship sailing on the ocean, symbolizing trade and investment.

Trade and Investment Agreements

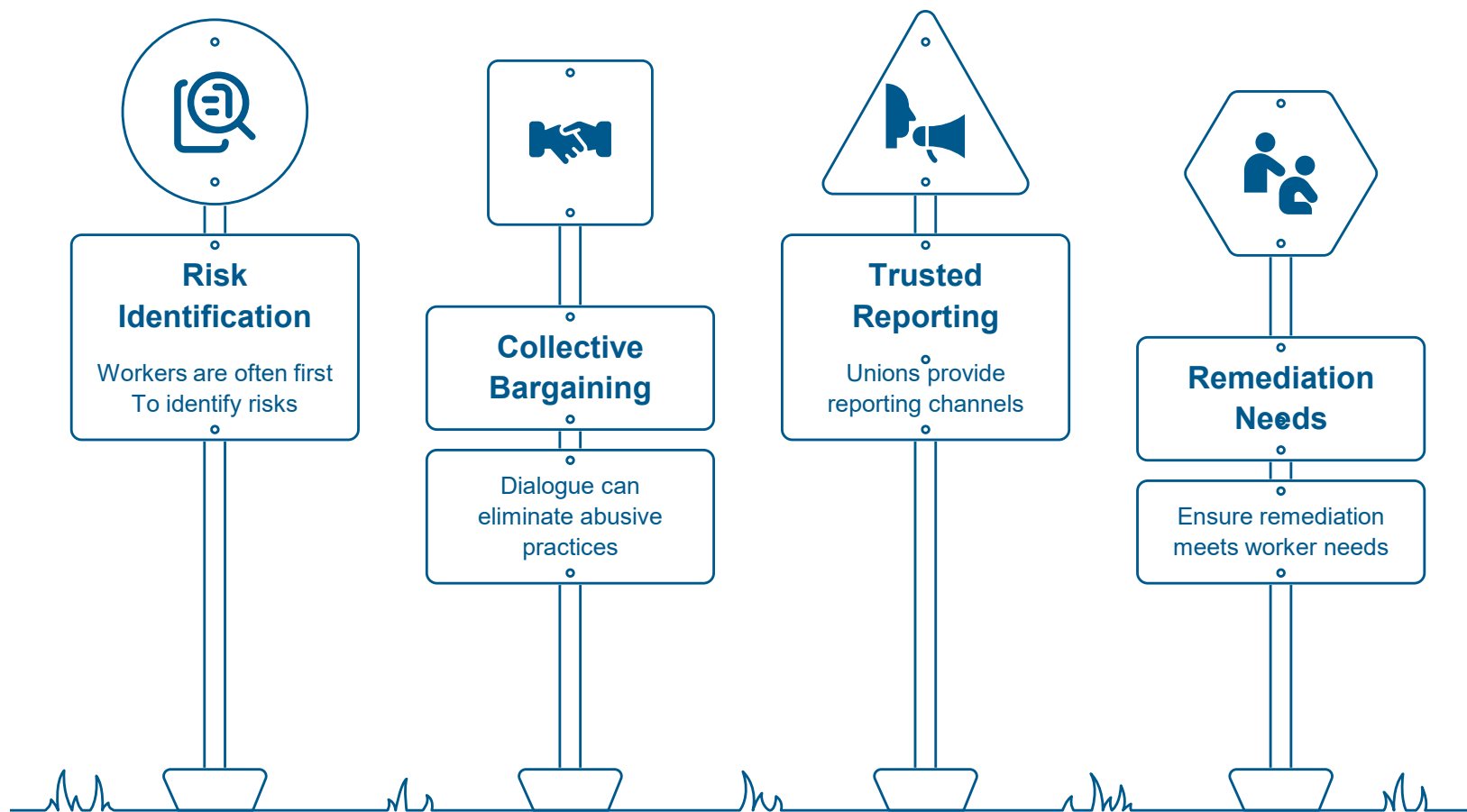
■ Regulation Examples

- **Transparency:** UK, Australia, Canada, California (USA)
- **Import bans:** US, Canada, Mexico, EU
- **HRDD reporting:** France, Germany, Norway, EU: CSDDD, CSRD, sector-specific directives (e.g., batteries, forestry)

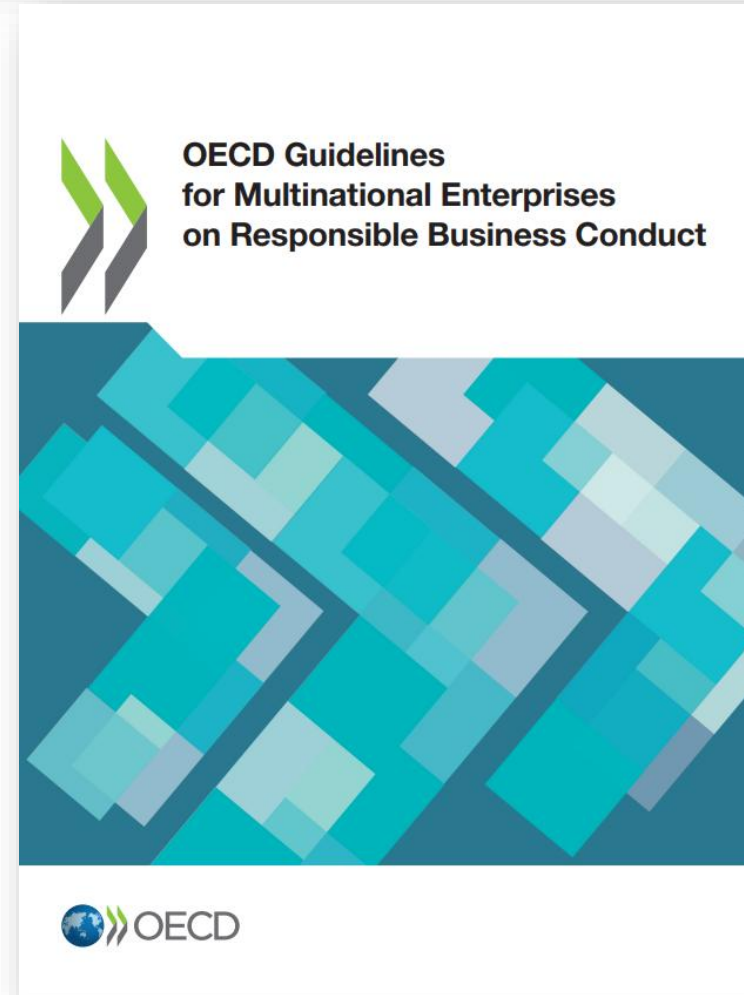
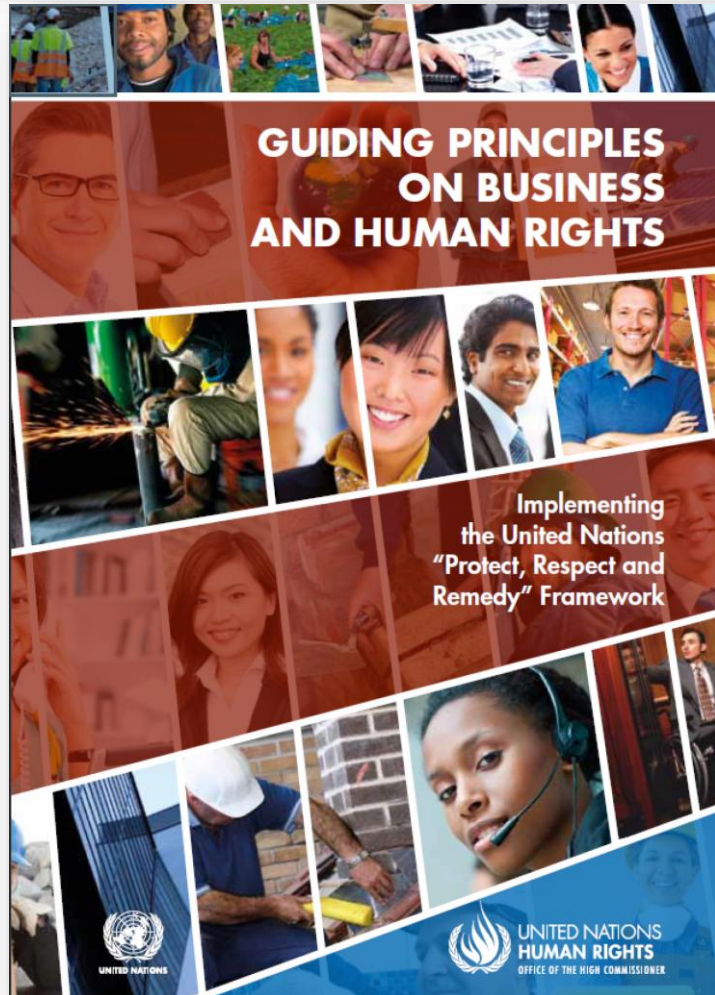
■ Trade and Investment Agreements Examples

- EU, Australia, UK, Canada, EFTA, SADC

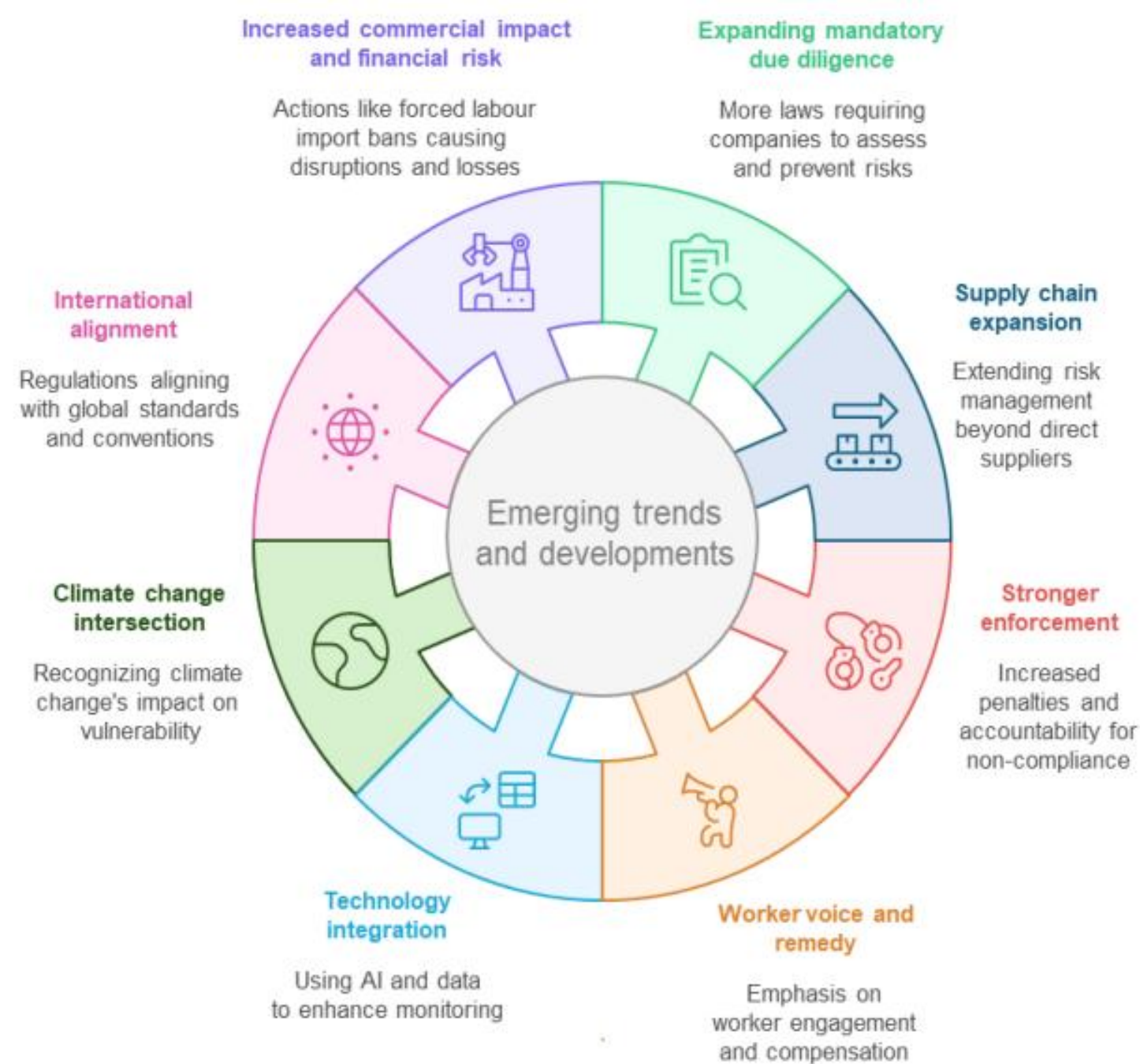
Workers and their representatives



Guidelines for business activities



Emerging trends and future developments



Source: UN SSE

- Trends suggest a shift from voluntary disclosure to mandatory due diligence set to accelerate
- Growing alignment of anti-slavery measures with broader sustainability agendas
- Interconnectedness of modern slavery with issues such as climate change is an emerging area of critical importance.



ALIGN

Recap & Tips



**Familiarize
yourself with
key frameworks**



Anchor

Treat international labour and human rights standards as non-negotiable baselines.



Embed

Use the UNGPs and OECD Guidelines as practical roadmaps.



Navigate

Build a clear understanding of the regulatory landscape.



Get started!



Familiarize yourself with key frameworks

Download the ILO MNE Declaration and Standards on Forced Labour as well as the Guiding Principles and OECD Guidelines to get started

Read more about the ILO MNE Declaration [here](#)

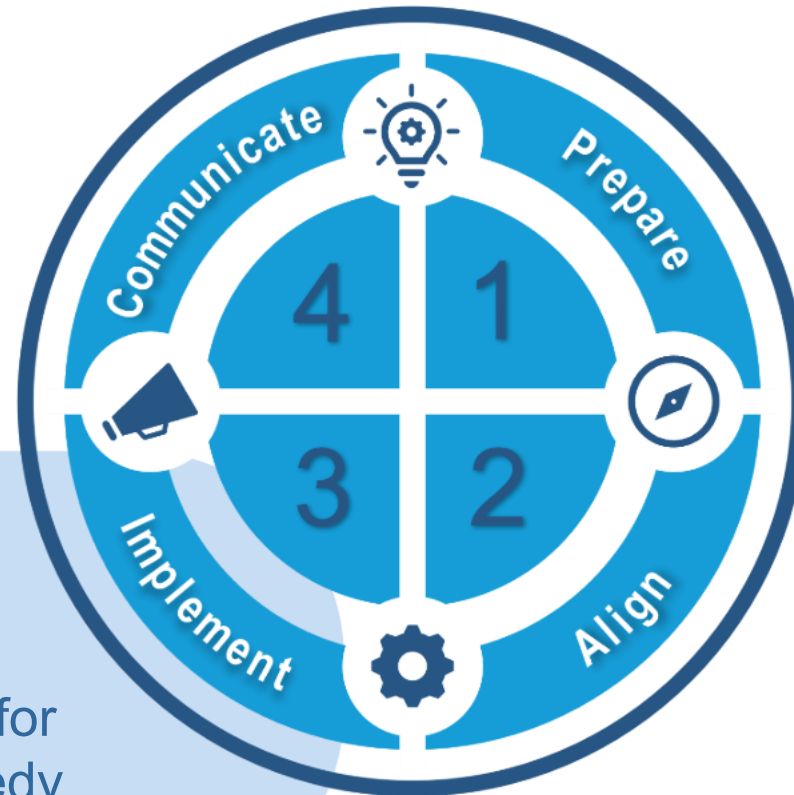
Find the ILO Standards [here](#)

Find the guiding principles on Business and Human Rights [here](#)

Find the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct [here](#)



IMPLEMENT



3. IMPLEMENT

Implementing the appropriate processes for due diligence and remedy

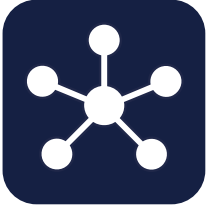


About us

Who we are



info@ethicalsupplychain.org



A specialist responsible sourcing program – established in 2004



all programs & services applicable to any industry



award-winning worker well-being programs



support available for members and non-members



offices across **Europe, USA & Asia**

Forced Labour Due Diligence

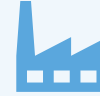
How Companies Can Reduce Risk and Protect Workers

1. Identify Risks



- Map the supply chain
- Identify high-risk countries, sectors and recruitment practices
- Prioritize highest-risk suppliers

2. Assess Suppliers



- Go beyond audits
- Engage directly with workers
- Review recruitment, subcontracting and labor providers
- Verify findings using multiple sources

3. Prevent Harm



- Set clear supplier expectations
- Build supplier capability
- Promote responsible recruitment
- Ensure effective grievance mechanisms

4. Respond & Remediate



- Investigate concerns promptly
- Protect affected workers
- Address root causes
- Use responsible disengagement only where remediation fails

5. Monitor & Improve



- Track corrective actions
- Verify improvements
- Continue worker engagement
- Learn from incidents

6. Report & Demonstrate



- Report transparently
- Measure outcomes, not just activities
- Demonstrate continuous improvement



Effective Remediation

Shared Responsibilities



EMPLOYER / SUPPLIER

- **Stop the abuse immediately.**
- **Protect workers** from **retaliation**.
- **Cooperate fully** with investigations.
- **Develop** and implement a **sustainable corrective action plan**.
- **Remedy harm suffered** by affected workers.
- **Demonstrate sustained improvement.**



CUSTOMER / BUYER

- **Raise concerns promptly when risks are identified.**
- **Work collaboratively** with the supplier to **develop a remediation plan**.
- Provide **realistic timeframes** for **corrective action**.
- **Support supplier capability building** through training and guidance.
- **Monitor progress** and **verify improvements**.
- **Recognise** and reward genuine **improvement**.
- Make responsible sourcing **decisions based on progress & worker outcomes**.

Case Studies

**What happens when risks
are left un-managed?**

CASE STUDY 1

Top Glove - Forced Labour (Malaysia)

What happened?



In July 2020, U.S. Customs prevented market entry of Top Glove disposable gloves over forced labour concerns.



The concerns centred on migrant workers' recruitment and working conditions.



US Customs & Border Protection (CBP) issued a formal forced labour finding in March 2021.



After remediation and evidence provision, CBP lifted the finding in September 2021.

Risks that Materialized



Import Restriction

U.S. Customs blocked imports of Top Glove disposable gloves.



Financial

Import restrictions and worker remediation costs.



Reputation

Global scrutiny of migrant worker conditions.



Investors

ESG concerns focused on labour controls.



Regulations

CBP lifted its Finding in September 2021.



Customers & Brands

U.S. buyers had to reassess sourcing.



Worker recruitment and conditions can affect market access. Remediation restored U.S. imports in 2021 after over 1 year restriction

CASE STUDY 2

Bumble Bee Seafoods (USA)

What happened?



Four Indonesian fishers filed a **landmark lawsuit** in the United States



Workers alleged **forced labour, violence, withheld wages** and **excessive working hours**



US courts allowed key claims against Bumble Bee to proceed



Risks that Materialized



Litigation

Landmark US lawsuit alleging benefit from forced labour in the supply chain



Financial

Legal defence costs and potential future damages; no public settlement to date



Reputation

International media attention and NGO scrutiny



Investors

Higher litigation and ESG governance risk



Regulations

Growing expectations for effective supply chain due diligence



Customers

Greater demand for responsible sourcing and transparency

Companies can face litigation and reputational damage even where labour abuses occur several tiers below their direct suppliers.

Quick Quiz

4. Which case study would you like to explore more deeply?

- Case 1 (Local)
- Case 2 (International)

A pop up box will shortly ask you to answer this question. If you do not see the quiz in zoom, you can answer in the chat box.

Case Study

Share your thoughts in the chat or via menti

What did the company do wrong?





IMPLEMENT

Recap & Tips



**Identify
possible forced
labour risks to
your company**



Assess

Prioritize risks based on severity and likelihood, focusing on people most at risk. Revisit assessment regularly.



Map

Systematically assess operations and value chain against risk factors to identify where modern slavery is most likely.



Act

Embed risk findings into contracts, audits, and corrective action plans, building capacity across the value chain.



IMPLEMENT

Get started!



Identify possible forced labour risks to your company

Building on the resources we discussed here, you can also make use of UNDP's 10 minute risk mapping survey to start thinking about forced labour risks in your company and supply chain and Walk Free's Benchmarking Tool to understand risks related to the way your business is operating.

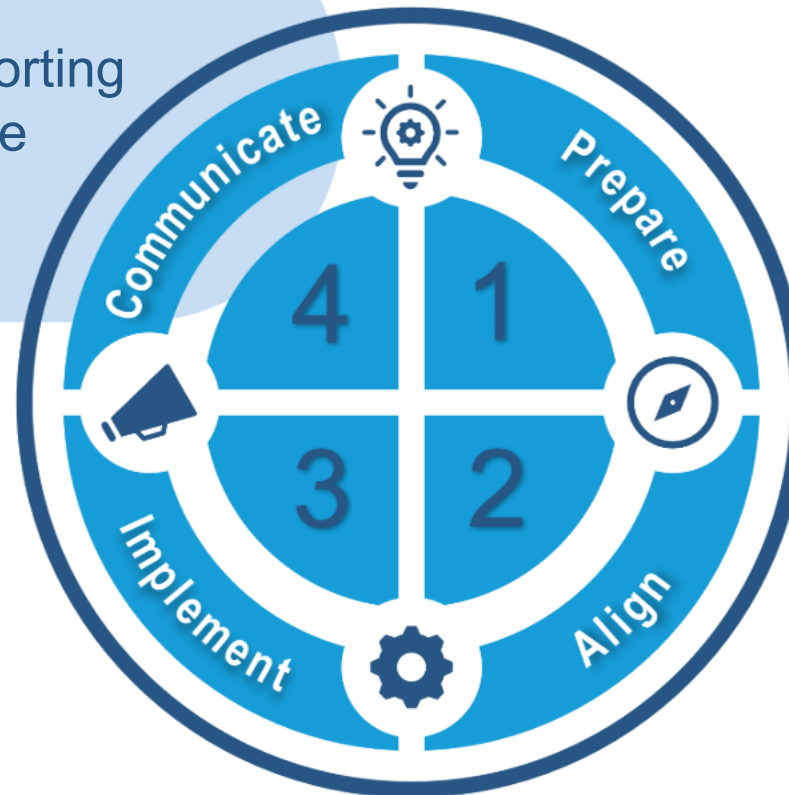


COMMUNICATE

4. COMMUNICATE



Ensure transparent reporting and disclosure about the company's response to forced labour risk



Why public disclosure matters



ESG Integration

Investors are incorporating modern slavery into their ESG evaluations.



Legal Requirements

Legal requirements regarding modern slavery disclosure are increasing.



Reputational Damage

Public exposure of modern slavery incidents can harm a company's reputation.



Internal Alignment

Strengthens internal alignment and oversight

What is FAST?

For **companies**, FAST helps identify which forced-labour information matters, define relevant indicators, assess data, and translate it into comparable, decision-useful disclosures for investors.

4 Workstreams:

1. Sustainable Finance
2. Business and Human Rights
3. AML-TIP
4. Survivor Inclusion

Workstreams

Goals

5 Goals for Finance:

1. Compliance with Laws
2. Knowing and Showing Risks
3. Leverage relationships and platforms
4. Remedy
5. Invest in Innovation (e.g. digital finance)

Stakeholders

FAST works across

1. Financial sector — banks, investors, asset managers, exchanges, data providers
2. Government and regulators — ministries, supervisors, FIUs, policymakers
3. Real economy businesses — companies, suppliers, employers, business associations
4. Workers and survivors — affected people whose experience informs risk identification, prevention and remedy



Forced labour disclosure as decision-useful information

Boohoo investors seek £100m in damages after minimum wage row

Legal move follows share price plunge after 2020 reports of company paying workers as little as £3.50 an hour



IndoAgri

Indofood Agri Resources – Material Risks from Contested Land and Labor Issues

Investors use disclosure to assess:

Exposure

Sector, geography, workforce, recruitment model, value-chain tier, high-risk suppliers.

Governance and risk management

Board oversight, senior accountability, HRDD integration, escalation, procurement controls.

Performance and effectiveness (Metrics and Targets)

Supplier mapping, grievance data, worker voice, recruitment-fee repayment, remediation, repeat findings.

Financial implications (Strategy)

Regulatory risk, import bans, litigation, operational disruption, revenue loss, valuation impact.

Let's discuss disclosure

Share your thoughts in the chat or via menti

**What information does
your company currently
share about forced
labour?**



Let's discuss disclosure

Share your thoughts in the chat or via menti

**Which framework(s) does
your company use to
disclose forced labor
risks and risk
management?**



Working with worker and survivor-informed data

The economic and human rights case

- Reveals risks conventional data may miss
- Tests whether policies, monitoring, and grievance mechanisms work in practice
- Improves the quality of indicators and disclosures
- Strengthens understanding of financial and operational risk
- Provides evidence on remedy and outcomes
- Supports regulatory and reporting requirements
- Brings the human impact behind the data into decision-making

Engagement must be rights-based and ethical

Participation should be safe, voluntary, informed and designed to avoid re-traumatisation, retaliation or extractive engagement.





COMMUNICATE

Recap & Tips



Assess what relevant data is already being collected



Measure

Base your reporting on concrete indicators and metrics that track outcomes



Disclose

Publish meaningful information regularly, reporting on your forced labour governance, risk assessment, and due diligence



Improve

Treat disclosure as a tool for continuous learning to strengthen your due diligence process



COMMUNICATE

Get started!



Assess what relevant data is already being collected

Before reporting, you first need to have the right data and information available to disclose. Start by identifying where you are now, then you can begin to chart the path forward.

Quick Quiz

5. How comfortable are you talking about Forced Labour in a work environment?

Rate your comfort level on a scale of 1-10
(1 for very uncomfortable,
10 ready to start the conversation)

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KEY RESOURCES

Your Homework

UN SSE CHECKLIST



Start a conversation



Familiarize yourself with key frameworks

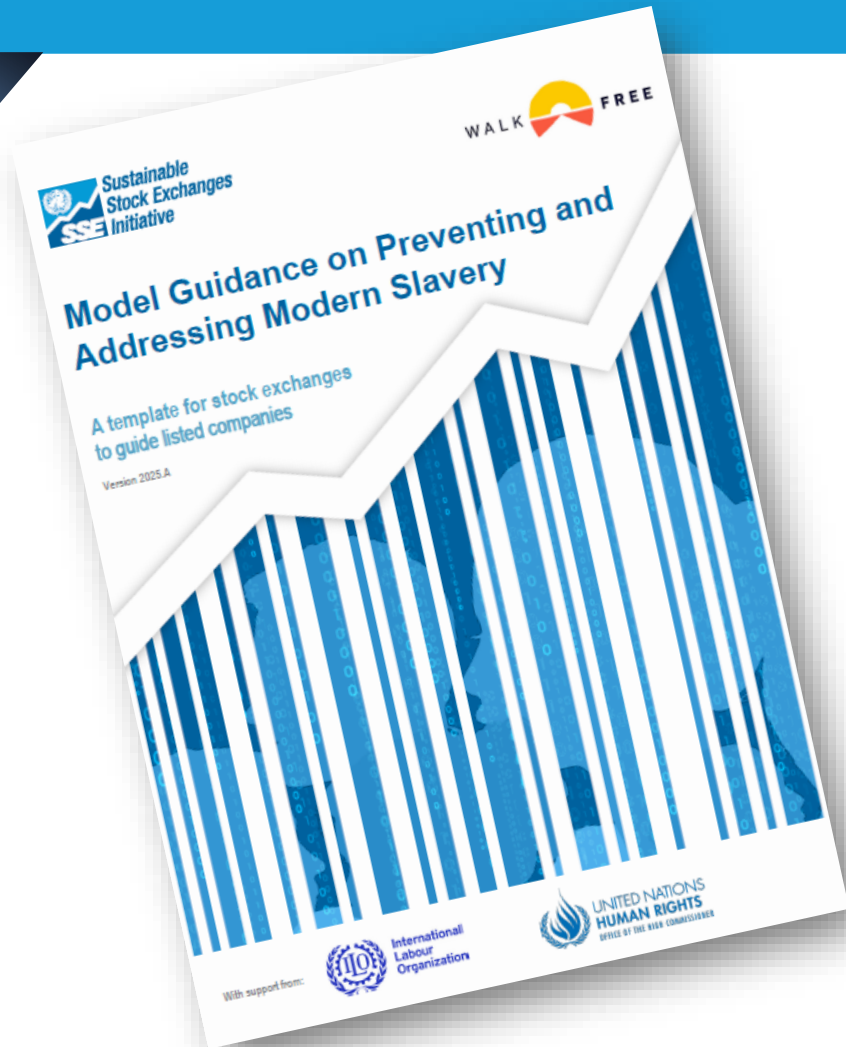


Identify possible forced labour risks to your company



Assess what relevant data is already being collected

Key Resource



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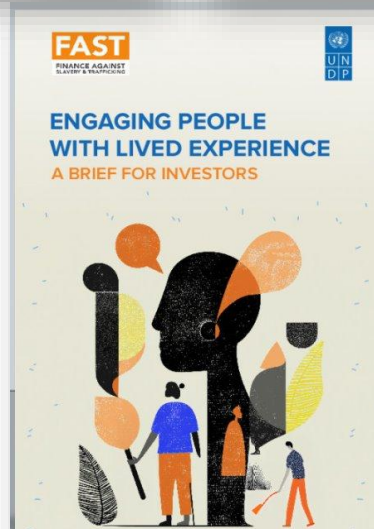
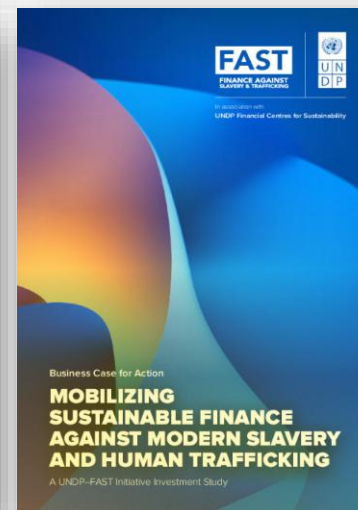
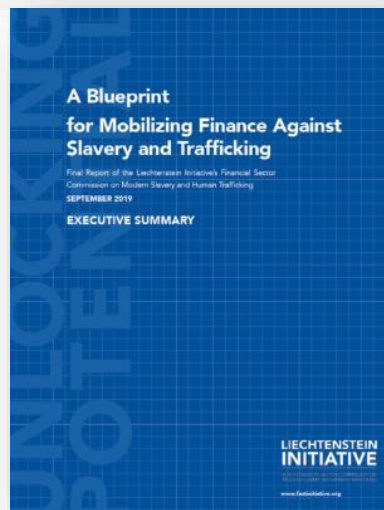
<https://sseinitiative.org/publications>

UNDP Tools

CONNECTION DIAGNOSTIC AND RISK MAPPING

Learn about your organization's possible connections to modern slavery and human trafficking.

<https://fastinitiative.net/risk-mapping/>



Visit:

www.fastinitiative.net

LinkedIn: [Finance Against Slavery and Trafficking](#)

Email:

Natasha Jung–
natasha.jung@undp.org

FAST@undp.org

ILO Tools



GLOBAL BUSINESS NETWORK ON FORCED LABOUR



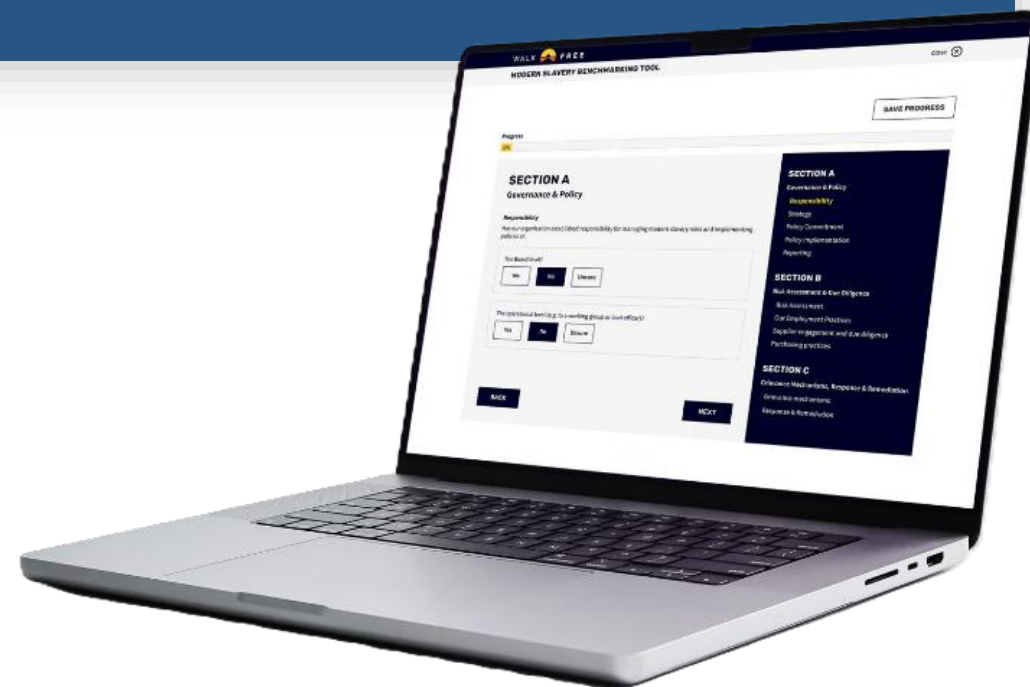
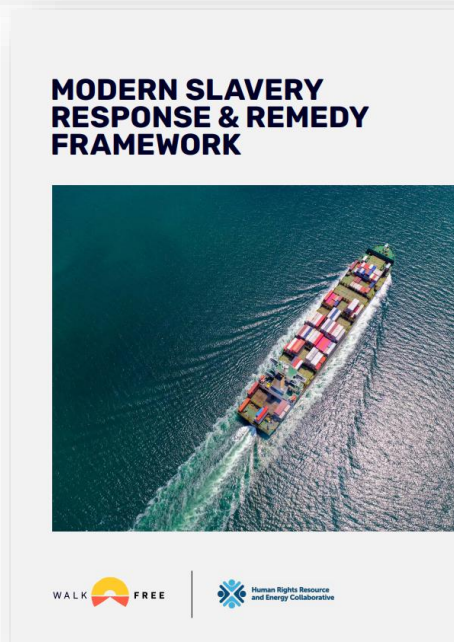
Visit:

<https://www.ilo.org/topics-and-sectors/forced-labour-modern-slavery-and-trafficking-persons>

Email:

assistance@ilo.org

Walk Free tools and resources



- **Businesses:** [Modern Slavery Benchmarking Tool](#)
- **Investors:** [Modern Slavery Business & Investor Toolkit](#)
- **Policy makers, standard setters, exchanges, etc:** [Promising Practices database](#)



Date Issued:

Help us improve this workshop

Your candid feedback is very valuable to us. Please take a moment to think about how we can further support your efforts to prevent and address modern slavery.

THANK YOU TO OUR OFFICIAL SUPPORTERS



Become an SSE Supporter today!

info@sseinitiative.org



*Sustainable
Stock Exchanges
Initiative*

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In partnership with



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WALK FREE

CONTACT DETAILS

SSE: training@sseinitiative.org

FAST: FAST@undp.org

ILO: assistance@ilo.org

Thank you!