

Eliminating Forced Labor in Global Supply Chains

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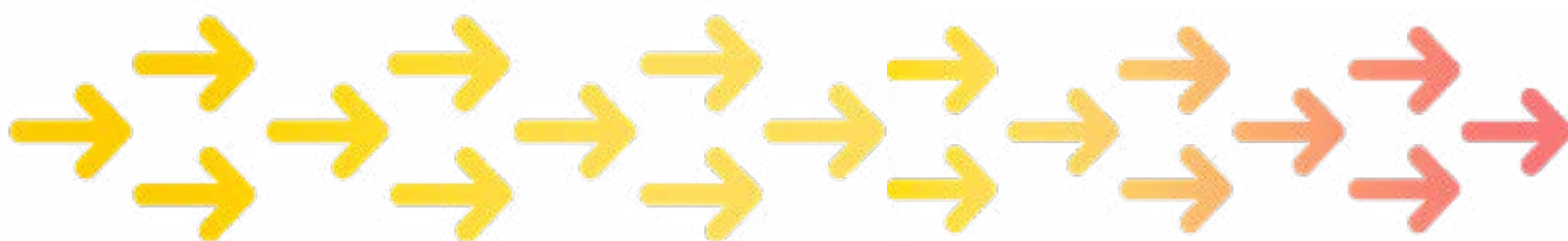
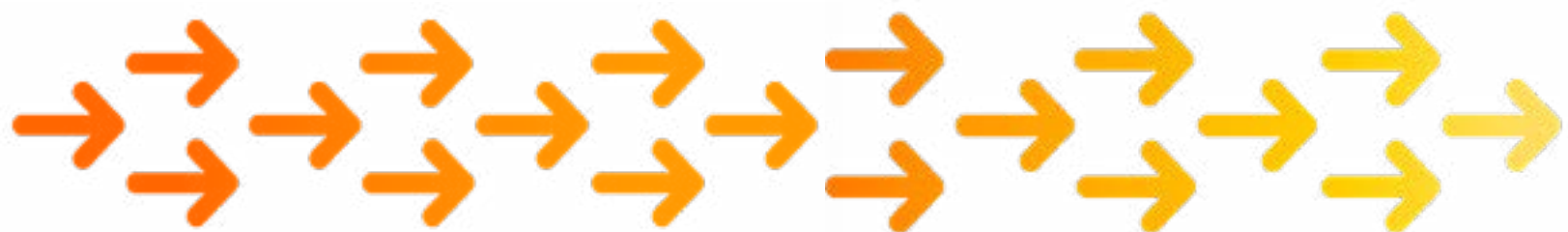
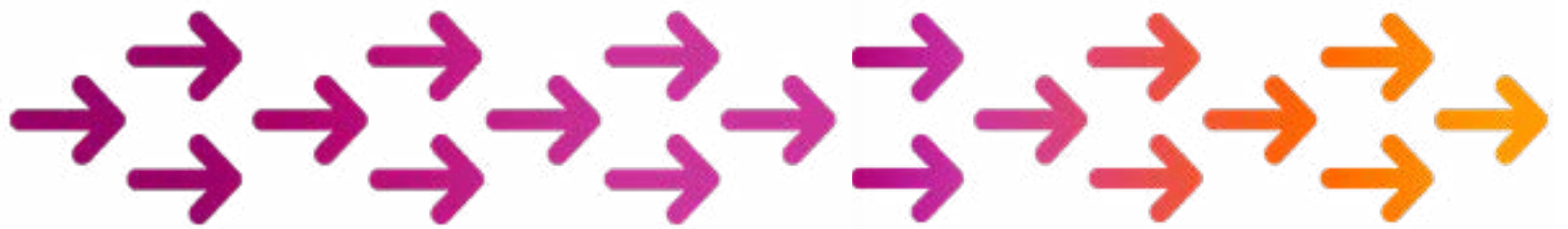


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Introduction

An estimated 27 million people are currently estimated to be victims of forced labor. This issue is further exacerbated by the negligence of “foreign subsidiaries, franchisees, joint ventures, and suppliers of global multinationals.”^{1,4} This guidance document will provide you with best-in-class practices, solutions, and tools to actively prevent human trafficking within a global supply chain.

This document discusses:

- the impacts of forced labor within the supply chain
- how to reduce the risk of it from contracts, and
- global expertise on how to prevent, detect, and remediate forced labor.

After reviewing this document, you will have critical tools at your fingertips to make decisions and move towards a supply chain free of forced labor. In doing so, you are doing your part to help your organization make the world a safer place. The decisions you make about who, where, and how you operate your supply chain can have larger impacts than you might imagine. It all begins with making the commitment and following best practices to actively prevent forced labor.

What is human trafficking?

A common global definition for human trafficking comes from the United Nations Palermo Protocol:

“ Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.”²

Based on this definition, human trafficking is composed of three main elements: work or service, menace of penalty, and involuntariness.³ Moreover, human trafficking may present in different forms such as sex trafficking, forced marriage, and our topic—forced labor.⁴ The terms forced labor, modern slavery, and human trafficking are used interchangeably throughout this document to refer to when populations at risk, often immigrants and migrant workers, are exploited.⁵ Exploitation takes place in a number of different ways such as “debt bondage, collateral, illegal deductions from wages, and confiscated or restricted access to travel documents like passports, permits and visas that limit workers’ freedom of movement.”⁵ For instance, hiring

agencies and suppliers may hire at-risk migrant workers who are desperate for a job, and trick them into forced labor. By the time the workers realize it, it is too late and they are in a situation that is difficult to escape from. In other situations, state-imposed forced labor leaves victims with no choice but to perform work against their will. Due to the frequency of corrupt practices and the complexity of supply chains, the problem of human trafficking is difficult to discover and is why it often goes unnoticed.

How big is the problem?

In 2023, the International Labor Organization (ILO) estimated that there are over 48 million victims of modern slavery, with over 27 million victims in forced labor situations.⁶ It is estimated that \$354 billion worth of products are made using forced labor that were imported by G20 countries.⁴ This problem is international; however, the United States is at the epicenter of the issue, having imported up to \$144 billion dollars worth of goods made using forced labor.³ These numbers show the shocking amount of work that needs to be done.

Some industries carry a higher risk of forced labor within their supply chains than others. The industries with the highest risk are electronics, garments, seafood, cocoa, sugar cane, timber, and cotton.^{4,7} However, no industry is immune. Furthermore, with more brand cautious consumers, organizations face the risk of brand damage if they lack visibility into their supply chain. If your organization was found to use forced labor, it could suffer significant penalties and the prevention of business activities.

Case Study: Global Horizons

In 2010, Global Horizons, a California-based labor company, was indicted for trafficking over 400 overseas workers for harvesting U.S. farms.^{8,10} Recruiters charged extortionate fees on contracts and confiscated passports.⁹ Workers went underpaid and were threatened with violence, all of which qualify under the U.S. definition of human trafficking.⁹ A farm operator, Maui Pineapple, claimed they were “not aware of the workers’ allegations at the time.”⁹ Despite this, in 2014, the district court in Hawaii ruled that Maui Pineapple and Global Horizons had to pay \$12.3 million in damages.¹⁰ Two years later, a federal judge awarded over \$7 million dollars in additional damages.¹⁰ If Maui Pineapples had more visibility into their supply chain, they could have avoided forced labor, financial loss, and brand damage.



What are the relevant US laws?

Many governments have created laws to combat human trafficking. Being familiar with these laws will ensure you understand what is expected of your organization to avoid violating legal requirements. The US has multiple laws surrounding the issue of human trafficking, including those outlined below.¹⁵ Other others, including Australia, Brazil, Canada, France, Germany, Italy, Mexico, New Zealand, and the EU and UK have moved forward on forced labor legislation.⁴ This is also a part of the United Nations' Sustainable Development Goals.¹¹

California Transparency in Supply Chains Act

Requires any company* that does business in the state of California "to report on their actions (e.g. assessments/audits) to minimize risk of forced labor in their supply chain."⁴

Federal Acquisition Regulation

"Companies must annually certify having implemented efforts to prevent, monitor, detect, and terminate prohibited activities (i.e. human trafficking) in their regulations."^{13**}

Section 307 of the US Tariff Act

Prohibits the importation of goods made with forced labor.³ The Act requires remedial action if forced labor is found and can block future imports.⁴

Executive Order 13627 and 13126

Prohibits public procurement officials from purchasing from businesses that are using forced labor or suspected of using forced labor.⁴

Section 1502 of the Dodd-Frank Act

Requires mining to identifying the risk sectors of gold, tin, tungsten, and tantalum and working to eradicate forced labor within those sectors.⁴

Trafficking Victims Protection Act

Seeks to protect victims, prevent human trafficking from occurring, and prosecute traffickers.¹⁴

Uyghur Forced Labor Prevention Act

Prohibits the US importation of goods made in the Xinjiang Uyghur Autonomous Region.

*That makes over \$100M a year

**Specifically for government contracts

See Additional Resources for more information

The United States is working to establish a national version of the California Transparency Act with H.R. 7089 (and S.B. 5693 and S. 3471) to make reporting actions to reduce human trafficking mandatory for all businesses.^{16,17,12} Your organization can practice reporting your efforts to ensure legal compliance. Learning the best practices to prevent human trafficking will help your organization identify potential risks, protect its brand image, and provide help for potential victims.



Initial Supply Chain Assessment

When your organization begins its journey to prevent forced labor, you can start with a basic assessment. You may already be doing assessments through regular check-ins with your suppliers. These assessments can now also help identify your baseline (i.e. current state) to prevent human trafficking within your supply chain.

Risk assessments

When beginning to understand your supply chain, it is helpful to first conduct a risk assessment. This involves identifying hazards, risk analysis, and performing evaluations.¹⁸ Risk assessments identify potential problem areas within your supply chain, such as supplier risks, geographic risks, industry-specific risks, and worker rights indicators for forced labor. See the Additional Resources section for guides to perform a risk assessment.

A key part of your risk assessment is highlighting your supply chain's labor practices. This is more than just how you source your products; it is how you source your workers.¹ Many suppliers hide their labor hiring practices which can be a risk of forced labor. Hiring workers through third parties, such as labor recruiters, contractors, agents, or other middlemen presents this risk.¹ By using risk assessments, best-in-class companies hope to gain a better understanding of the problem areas within their supply chain.²¹

Case Study: Everlane

An exemplary company for assessments and audits is Everlane. As an apparel company, Everlane is in a high-risk industry for forced labor. On its website, it discloses efforts in regards to the California Transparency in Supply Chains Act and efforts to make sustainability a part of its brand. Everlane disclosed that it conducted third-party audits, certifications, and assessments for their suppliers.¹⁹ It formed close long-term relationships with its suppliers which has allowed Everlane to be more transparent with its customers and trace within the supply chain itself.²⁰

Workplace audits

Auditing your suppliers can give your company an inside look into what would normally go undetected and verify that your supply chain is following best practices and codes of conduct.

When conducting an audit, there are two main approaches companies can follow. You can either perform a self-audit, using your own employees and guidelines, or hire a third-party (e.g. an NGO) to regularly audit your suppliers for you. Third-parties are often qualified and have experience detecting human trafficking within supply chains.⁵ Though auditing is a best practice, it is not a perfect solution. It can be slow, miss important details, and potentially be invalidated through hiding or corruption.

Auditing is important for understanding events occurring within your supply chain, but it must be utilized as part of a larger process to capture additional information. In addition, there are digital solutions to supplement traditional audits. These solutions take into consideration worker voice and can make the audits faster and more robust. For example, Apprise and Ulula are both applications for workers' phones through which workers can safely self-disclose information about their working conditions. This can help bridge the gap in the auditing process by incorporating workers' feedback in a way that ensures their safety.^{22,23}

Supply chain transparency

The tracing of purchases is becoming more and more frequent in global supply chains.²¹ The goal is to extend how far upstream we can follow a product. You may already know all of your Tier 1 suppliers, but what about your Tier 2, 3, and 4? By increasing transparency, you can also identify at-risk workers and protect their rights.

Implementing supply chain transparency will require the help of your suppliers. At first, your suppliers may not be prepared to share this information with you. However, by maintaining a good relationship with your suppliers and emphasizing trust, you can help assure them that information sharing is mutually beneficial, without them worrying they will be terminated or replaced.

Mapping out your entire supply base can be a great visual aid for your team to use. The complexity of supply chains can make it difficult to trace as you go up each tier, but the time investment will become a competitive advantage. The supply chain mapping you develop can help your organization understand the type of suppliers and workers it is supporting, rapidly identify problem areas, and gain new insights.⁵



See Additional Resources for
more information

Establishing Standards and Policies

Based on the assessments your organization completed in the prior steps, you now have a better understanding of the size and scope of your supply chain and any potential forced labor risks. This baseline can be utilized to track your improvement over time. The following section focuses on working to mitigate these risks by creating standards and policies.

Creating strong policies

Creating policies can communicate expectations in your contracts and vendor agreements in a clear and concise manner.²⁴ When writing policies, you can use widely-accepted, standard language that establishes best practices for eliminating forced labor. Alternatively, you can customize one to suit your organization.²¹

Of these policies, one should be to abide by a code of conduct. By creating a code of conduct, you can explicitly prohibit human trafficking and define worker protections.²⁴ This will help suppliers perform self-assessments based on your expectations, so they know how they will be measured over time.

The code of conduct should be shared across your organization and employees should be encouraged to familiarize themselves with public reporting practices. A common way to share this with the public is to refer to your organization's sustainability reports regarding labor rights. This helps strengthen commitment to the policies you developed. Getting into the habit of publicly reporting best practices is a good way to promote transparency, meet legal requirements, and set expectations with your organization, customers, and suppliers.

Vendor agreements

[See Additional Resources for more information](#)

It is vital that your suppliers understand what labor requirements they are agreeing to by adding language to your vendor agreements and contracts.²⁴ These contracts serve as a formal commitment to anti-trafficking by the entire supply chain, which hold everyone accountable.²⁴ This language could be in the form of a new clause, a social responsibility agreement, an addendum to existing contracts, or a separate agreement.

In supplier relationships, you can leverage your purchasing power to ensure they are accountable to your ethically responsible standards.⁵ When assessing suppliers, your preference towards ethical suppliers can be a criterion for quote assessments, similar to price or quality.⁵ Knowing which companies have been connected to forced labor is important, and there are databases and alliances that keep this information. By creating strong, ethical vendor relationships, you are a step closer to ensuring your supply chain protects human rights.

Recruitment policies



Ethical labor recruitment requires working with your current suppliers to implement a strong screening process to decrease the risk of human trafficking.²⁴ When hiring through a third-party, your company should have a due diligence policy for labor recruitment, including recurring evidence and confidence that labor recruiters will not break these policies or standards.²⁴ By conducting regular, non-disclosed independent check-ins of labor recruiters, you can track actual performance and compliance to your contracts.

Conducting worker interviews allows you to determine compliance firsthand. There should be compliance efforts in place to regularly include worker input “including systems for gathering information from migrant workers through direct interview or other confidential feedback mechanisms.”²⁴ As mentioned in the Auditing section above, Apprise and Ulula are implementing safe feedback channels through workers’ cellphones.

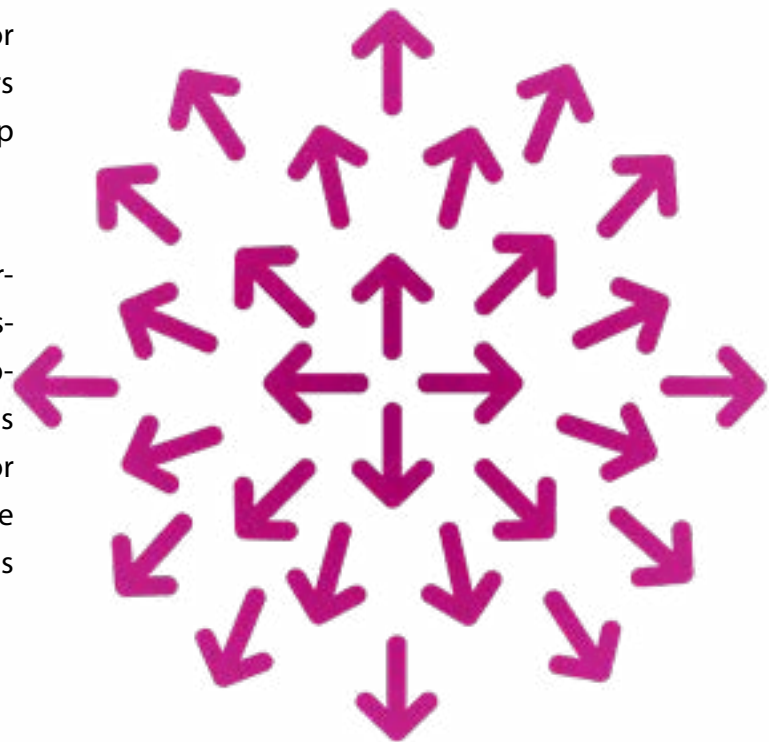
Interviews should make workers feel safe and comfortable opening up about their experiences. Using local language interviewers and conducting interviews away from the work-site can help build this trust.²⁴ Make sure that during the interview, the interviewees are chosen at random, paid for their time off-site, and remain anonymous. Moreover, be sure to rotate a predetermined set of questions, remain transparent about the interview process, and explain the grievance process for protecting workers.²⁴ Encouraging labor administration involvement can also help enforce ethical working conditions during worker assessments and ensure workers know their rights.⁵

Conducting interviews and reviewing recruitment policies are both strong ways to ensure your supply chain is mitigating human trafficking.⁵

Supplier benchmarks and KPIs

After coordinating with your suppliers on their recruitment policies, you can create achievement benchmarks. Labor benchmarks can incentivize your suppliers and recruiters to practice the policies you have agreed to. This will help suppliers improve over time.²⁴

One example of a benchmark is having suppliers regularly take a supplier self-assessment.²⁴ This supplier assessment can point out the strengths and weaknesses of suppliers and the gaps where improvement is needed.²⁴ This tool, along with other evaluation policies, should monitor key performance indicators (KPIs) to allow for accurate evaluation.²⁴ This can help to reward improvement that is being made over time.



Protecting survivors

When writing policies to eliminate forced labor, you should include policies to establish remedial action. This ensures you are prepared to help if victims of human trafficking are found in your supply chain. In order to protect survivors, you need a “formalized way for workers to raise concerns about any impact they believe a company has on them, in order to seek remedy,” often called a grievance mechanism.²⁵ Grievances should be identified and addressed by the company for remediation.²⁵ Grievance mechanisms should be easy to access, use, transparent, predictable, equitable, and based on dialogue and engagement.²⁵ This can help ensure workers feel safe submitting their grievances.

Remedial action involves the three R’s: rescue, rehabilitation, and reintegration.²⁶ It starts with removing the survivors from their abusive work situation, supporting rehabilitation to get them the help they need, and encouraging reintegration by helping them build trust in others and re-engage with society. For remediation, there should be more victim-centered steps like restitution, compensation, rehabilitation, punitive sanctions against the trafficker, and guarantees of non-repetition.²⁵



Implementation

After writing out your policies and requirements, you can put them into practice in the implementation phase. You may face some initial challenges, but this is part of the process.

Department implementation

During the implementation phase, you should work to disseminate the policies you created throughout your procurement organization through trainings and workshops. These trainings should cover the requirements for contracts so all procurement professionals understand your approach to prevent human trafficking in the supply chain of your organization.⁵

Additionally, workshops can have a similar impact and help reinforce concepts for prevention. Obtaining buy-in from management can help ensure these policies are implemented smoothly throughout the department and larger organization.



Performance assessment

After establishing standards and sharing them with your suppliers, you can update your contracts. For existing relationships, you can amend the contracts to include clauses that combat forced labor. Alternatively, you can add new policies to renewed contracts. To make this process easier, you can update your organization's contract templates. This way, all future contracts will incorporate this language.

After suppliers have agreed to the new contract language, you should meet regularly to discuss standards, expectations, and contract performance over time.⁵ They should expect that these contract clauses are going to be enforced, that their actions will be measured, and that they will be held accountable.

See Additional Resources for more information

Industry associations

Your organization may want to consider joining an industry group or association that shares your vision. This would enable you to share best practices toward preventing human trafficking through procurement and keep you up to date with industry-wide commitments to uphold human rights and labor standards.²¹

Supplier rationalization

Supplier rationalization is a strategy to reduce your supply base by working with fewer, trusted suppliers. Your organization could pursue this strategy if there are too many suppliers to trace. Similar to vertical integration but at a much lower cost, this would promote a stronger, more transparent supply chain.

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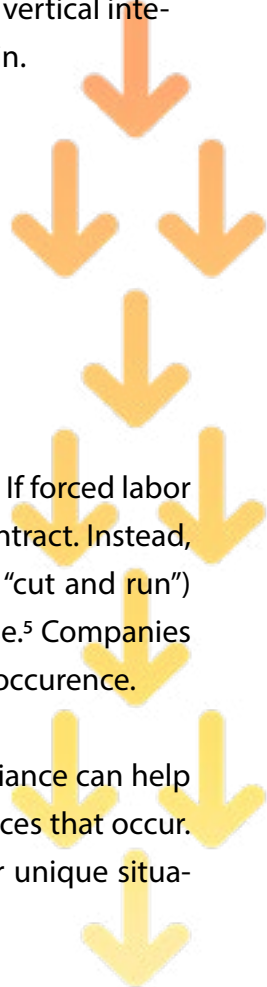
Working with a smaller number of more credible suppliers with proactive management practices is one way to increase the confidence and integrity of supply chains, and tools can help identify and monitor leading supplier companies.²¹

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Remedial action mechanisms

If a supplier is not following your policies or standards, then remedial action may be necessary. If forced labor is suspected, in most situations (except the XUAR) you should not immediately terminate a contract. Instead, work with your suppliers to help improve their practices.⁵ Canceling the contract (known as “cut and run”) will have unintended consequences and is likely to make at-risk workers' situations even worse.⁵ Companies should instead remediate the occurrence and take corrective action to protect workers from reoccurrence.

Ongoing supplier training initiatives are helpful. Partnering with a trained NGO or industry alliance can help with this. Keep in mind that there may be multiple levels of stakeholders aware of the grievances that occur. Once identified, workers should receive the help and justice they ask for, depending on their unique situation.⁵ Finally, there should be mechanisms to ensure remedial action is completed.



Ongoing Assessment and Compliance Management

After implementation, the process of assessing, documenting, revising standards, and reviewing begins. There is no “finish line” when it comes to human trafficking vigilance. While you may have gained visibility into your supply chain, there is always going to be risk. This is why ongoing assessment and compliance management is an essential process.

[See Additional Resources for more information](#)

International Certification

As your organization performs ongoing management, a way to encourage success is to seek third-party certification. You can think of certifications as recognition for the work you put into vigilance. This can also help continuously elevate standards. There are a wide variety of certifications that your organization can pursue. You can search for certification schemes based on your industry. Common examples are B-Corp and ISO 20400.

Overcoming Barriers

After reading this guidance, you now have a foundational understanding of best practices for combatting human trafficking within your supply chain. This may require overcoming common hurdles.

Complexity. Supply chains span geographical, legal, and industrial areas, with an exponentially increasing number of suppliers in each tier. At first, there will be limited end-to-end visibility which can make tracing your entire supply chain difficult.²¹

Resistance to Change. Your employees and suppliers may have limited resources to pursue changes in your supply chains.²¹ Additionally, there may be corrupt practices in the country in which you are doing business, such as unethical handling on contracts, bribing officials, and paying workers below the minimum wage.¹

By following this guidance, including working closely with your suppliers and abiding by new laws, you can overcome these barriers. There is no single perfect solution which is why all suggestions should be taken and implemented together. The road to reducing the risk of forced labor is not easy; however, by following the guidance in this procurement training, you are taking critical steps toward protecting the supply chain of your organization and meeting the social responsibilities expected by your stakeholders.

Additional Resources

Selection of Relevant Laws:

- [Uyghur Forced Labor Prevention Act](#)
- [U.S. Tariff Act](#)
- [California Transparency in Supply Chains Act](#) (U.S.)
- [U.K. Modern Slavery Act](#)
- [EU Forced Labor Ban \(provisional\)](#)

How to monitor your supply chain:

- [Ethical Trade - Due Diligence Framework](#)
- [Workplace Monitoring Reports](#)
- [The path to supply chain transparency](#)
- [Resilinc](#) – supply chain mapping and risk alerts

Tools to help map your supply chain:

- [Open Sourcemap](#)
- [Verité Cumulus platform](#)

How to establish a code of conduct and set up a worker hiring process:

- [Verité - Fair Hiring Toolkit](#)
- [Verite - Codes of Conduct](#)

Identifying risks and interviewing workers:

- [Stronger Together](#) - Toolkits for agricultural workers
- [Elevate](#) - financial history of suppliers, even private companies
- [Department of Labor](#) - Identifying risk by product commodity / country

How to properly handle recruitment fees:

- [Eliminating Recruitment and Employment Fees Charged to Workers in Supply Chains](#)
- [Guide on Implementing the UN Guiding Principles on Business and Human Rights](#)

Writing a modern slavery statement:

- [2018 Quick Guide to Writing a Voluntary Modern Slavery Statement](#)

Company examples:

- [Adidas](#) - Complaint Process
- [Eileen Fisher](#) - Traceable Cotton
- [M&S](#)
- [Patagonia](#) - The Footprint Chronicles

Certifications:

- [ISO 20400](#)
- [Institute for Supply Management \(ISM\)](#)
- [Chartered Institute of Procurement and Supply \(CIPS\)](#)
- [Fair Trade](#)
- [Rain Forest Alliance](#)

Social Compliance Ratings:

- [JUST Capital](#)
- [MSCI ESG Ratings](#)
- [Newsweek Green Ratings](#)

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