

Anti-Slavery Legislation Comparison Table: Disclosure in Supply Chains

KEY

- = Comparison match
○ = Comparison difference

	MODERN SLAVERY ACT 2015 (MSA) Section 54	CALIFORNIA- TRANSPARENCY IN SUPPLY CHAINS ACT 2012 (TISCA)
Who does it apply to?	<p>ALL business sectors including goods & services as well as supply chains</p> <p>Organisations carrying out any part of their business in the UK</p>	<p>Limited to retailers and manufacturers but only supply chains for goods</p> <p>Companies doing business in the state of California</p>
Financial Threshold	<p>Applicable to businesses with annual global gross turnover of £36 million or more (approx. \$54 million)</p>	<p>Applicable to businesses with annual worldwide global receipts in excess of \$100 million</p>
Requirements of businesses	<p>Must prominently disclose on company website a slavery and human trafficking statement. There must be a clearly marked link to the statement in a prominent place on the homepage. If no website then a written statement upon request within 30 days is required</p> <p>Annual requirement (every financial year)</p> <p>No specific requirements as to content and format of statement is required.</p>	<p>Must prominently disclose on company website a slavery and human trafficking statement. There must be a clearly marked link to the statement in a prominent place on the homepage. If no website then a written statement upon request within 30 days is required</p> <p>Annual requirement</p> <p>The statement must contain at minimum the 5 specific requirements set out in the Act as to what extent, if any, that the retail seller or manufacturer is doing to ensure no slaves are used in the supply chains for goods.</p>
Requirements of businesses	<p>Action brought by the Secretary of State for a civil remedy-High Court will issue Injunctive Relief</p> <p>Companies can be forced to make disclosure statement</p> <p>No requirement to actively eradicate slavery from the supply chain</p>	<p>Action brought by the Attorney General of California for a civil remedy -Injunctive Relief</p> <p>Companies can be forced to make disclosure statement</p> <p>No requirement to actively eradicate slavery from the supply chain</p>

<p>What can companies do to ensure compliance?</p>	<p>Due diligence http://clt-envirolaw.com/category/human-rights-due-diligence/</p> <p>Mapping supply chains by identifying suppliers and contractors including identification of hot spot suppliers and countries</p> <p>Education of staff including appointment of staff who will manage supply chains and slavery</p> <p>Recognition of who within the company structure is required to authorise and sign off the statement and it's content</p> <p>Implement auditing and verification procedures</p>	<p>Due diligence http://clt-envirolaw.com/category/human-rights-due-diligence/</p> <p>Mapping supply chains by identifying suppliers and contractors including identification of hot spot suppliers and countries</p> <p>Education of staff including appointment of staff who will manage supply chains and slavery</p> <p>Recognition of who within the company structure is required to authorise and sign off the statement and it's content</p> <p>Implement auditing and verification procedures</p>
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