

7 Core Criteria for a Modern Slavery Statement

A plain-English checklist for supplier portals and buyer due-diligence packs

Buyers and portals rarely publish a perfect checklist, but the same themes come up again and again. Use these seven criteria when writing or reviewing a statement. Each one maps to a section in the ESG Complete free template.

How to use this guide

Work through each criterion in order. Tick off the "What to include" bullets against your draft. Prefer short, honest answers over long claims you cannot evidence. This is not legal advice; adapt wording to your operations and jurisdiction.

1. Describe the entity and its operations

Reviewers need to know who you are, what you do, and where your supply chain sits before they trust the rest of the statement.

WHAT TO INCLUDE

- Legal company name and registration number for your country
- What the business does in plain language (products, trades, or services)
- Where you operate and where you source goods or labour
- Whether you are a standalone entity or part of a group (briefly)

Tip: Stay factual. Skip marketing slogans. If you only operate in one country, say so.

Use in template section: Entity Structure & Operations

2. Set out your commitment and policies

Show that modern slavery is prohibited and owned at a senior level, not just mentioned in passing.

WHAT TO INCLUDE

- A clear commitment to prevent modern slavery in operations and supply chains
- A short definition (forced labour, trafficking, debt bondage, servitude)
- Which policies or standards apply (procurement, code of conduct, HR)
- Who is accountable (director / authorised signatory level)

Tip: Do not claim certifications or policies you do not have. "Under development" is honest and acceptable for SMEs.

Use in template section: Commitment & Policies

3. Identify supply chain risks

Portals and buyers look for evidence you have thought about where risk actually sits, not a generic paragraph.

WHAT TO INCLUDE

- High-risk categories that apply to you (e.g. overseas manufacturing, apparel, logistics, cleaning contractors)
- Countries or regions that increase residual risk
- If risk is low: say why, and commit to ongoing monitoring
- Avoid naming invented suppliers or audit scores

Tip: Naming real risk categories (even a short list) is stronger than claiming you have zero risk everywhere.

Use in template section: Supply Chain & Risk Identification

4. Explain due diligence and actions

Describe what you actually do with suppliers: contracts, questionnaires, and follow-up when something looks wrong.

WHAT TO INCLUDE

- Whether purchase orders or contracts include a modern slavery clause
- Whether you send a supplier questionnaire (and how often)
- Who reviews responses and what happens if answers are incomplete
- Any other practical steps (screening new suppliers, right to audit language)

Tip: If a control is still being rolled out, say it is under development. Empty claims get challenged.

Use in template section: Supplier Due Diligence & Actions Taken

5. Cover training and awareness

Show that people who hire or buy for the business know what to look for.

WHAT TO INCLUDE

- Which roles receive training (procurement, hiring managers, site leads)
- Frequency: annually, onboarding only, or under review
- Format in one line (toolbox talk, e-learning, induction pack)
- That content is practical, not theoretical

Tip: If you have no formal programme yet, say training is under review. Do not invent completion rates.

Use in template section: Training & Awareness

6. Provide grievance and reporting routes

People inside and outside the business need a way to raise concerns safely.

WHAT TO INCLUDE

- A concrete contact (email, form, or named role)
- That reports can be confidential
- That retaliation against good-faith reporters is not tolerated
- Who can use it (staff, contractors, suppliers, others)

Tip: A real email address beats "contact management" with no details. Use the same channel you already publish if you have one.

Use in template section: Grievance & Reporting Mechanisms

7. Show effectiveness and continuous improvement

Close the loop: how often you review the statement, how you know controls are working, and how you improve.

WHAT TO INCLUDE

- Review frequency (e.g. every 12 or 24 months)
- What you use as signals (questionnaire completion, training coverage, concerns raised)
- Consultation with owned or controlled entities, or a clear "not applicable" if standalone
- A short continuous-improvement commitment for the next period

Tip: Finish with an authorisation block: approved by a named authorised signatory and date. Reviewers look for that sign-off.

Use in template section: Effectiveness, Consultation & Continuous Improvement

After the seven criteria: add an Authorisation block with the authorised signatory name, job title, and date. Many reviewers treat a missing sign-off as incomplete.

Prefer not to spend 3 to 5 hours writing it?

Answer a short questionnaire and ESG Complete produces a portal-ready Modern Slavery statement for you. Same criteria structure as this guide. **US\$249**. Usually the same day. Revisions included.

Start here: <https://www.esgcomplete.com/modern-slavery-template/thank-you?scroll=think-about>