

Issue	Baseline	Level 1	Level 2	Level 3	Level 4
Company Structure	The company has minimum documented evidence in relation to its business operations, but has not demonstrated that it has communicated the details both internally and externally	The company has documented evidence and has clearly communicated the details both internally and externally	As level 1 <b>AND</b> it has also ensured, through adequate training that the Executives, Directors and Senior Managers are fully conversant with their obligations within their roles	As level 2 <b>AND</b> they have fully evaluated and documented their operations to understand all high risk areas in relations to the Ethical Labour issues	As level 3 <b>AND</b> it also can demonstrate that it has acted upon weaknesses and addressed any potential areas which could have resulted in a non-compliance with the act itself.
Management Policies	The company only has a partial set of company policies in relation to SHEQ, MSA, Ethics, Employment and Human Resources etc.	<p>The company has a full set of policies in place for; SHEQ; MSA; Responsible Sourcing; Ethics , Fraud and Malpractice; Anti Bribery and Corruption; HR</p> <p>The company has evidence that these policies have been communicated and that staff have been trained in their application, that training records are available and that policies are displayed. That there is evidence that the policies have been updated and managed accordingly.</p>	As Level 1 <b>AND</b> it also has developed an assurance and compliance programme to audit and address any observations identified in the implementation of the policies as listed above. Where the company operates outside of the UK / domestic market it can provide evidence that not only that its policies have been communicated to the relevant offices but also that all staff in those location have been trained in the implementation of the policies	As level 2 <b>AND</b> the policies and procedures are verified and certified in accordance with ISO 9001, / 14001 / 18001 or other ISO or similar standards, if applicable. The company can also demonstrate it operates a non prejudicial whistleblowing policy and process which also has a victim or reporting protection process	As level 3 <b>AND</b> the company collects and communicates best practice within its own business or its supply chain to improve the company policies and can demonstrate it has gained best practice or guidance documents to help inform as to how to improve policies in the future
Management Systems	The company does not have any documented evidence that its systems are adequate to address the requirements of the MSA. The company only has evidence to demonstrate legal compliance.	The company can demonstrate that its management systems are certified to a recognised standard. That the management system adequately includes for compliance to the MSA act . That it can demonstrate it complies with the legal requirements in all of its operation and wherever it operates. The company has a copy of the act and its guidance and that its Health and Safety policies and procedures adequately manages the welfare of its staff wherever it operates	As Level 1 <b>AND</b> the company has mapped the specific risks by both process and locations it operates and it has a risk mitigation programme to address any related risks for non- compliance to the MSA act/Ethical sourcing practices. It can demonstrate that on reviewing the act it has made a judgement as to what changes have been required in its management systems to comply with the act	As level 2 <b>AND</b> the company has mapped both 80% of spend and activity of its business and carried out a full risk assessment by both process and locations it operates and it has a risk mitigation programme to address any related risks for non- compliance to the MSA act. It can demonstrate that on reviewing the act it has made a judgement as to what changes have been required in its management systems to go beyond compliance with the act	As level 3 <b>AND</b> by way of the implementation of the risk management process it can demonstrate that the company has actively improved the lives and wellbeing of any workers who were subject to previously non-compliant practices in the reviews. It can demonstrate that on reviewing the act it has made a judgement as to what changes have been required in its management systems to go beyond compliance to the act, and work to the spirit of the law.

Assurance & Auditing	The company does not operate either an internal assurance or risk assessment process to monitor and report on its compliance to its own policies and procedures	The company does operate an internal audit process and a risk management process, however it cannot demonstrate that it has included for compliance to the MSA or any related activity in relation to the Ethical Sourcing of Labour, or in terms of Human Rights for the company's labour force	The company has a fully defined auditing and risk management process in place. It can demonstrate compliance that it records all such events and outcomes and actively monitors all observations and risks	As level 2 <b>AND</b> it can demonstrate that they have actively improved the lives and wellbeing and working conditions of any workers who were subject to non-compliant practices in the reviews . The company has been recognised formally to have demonstrated best practice or has been subject to case studies to inform others as to best practice	As level 3 <b>AND</b> the company has been actively engaged in the sharing of the best practice, data, results so as to become a business mentor to other organisations and can be seen as a subject matter expert by implementing a robust compliance and assurance programme
HR	The company can only provide basic evidence that it protects its workers through their employment contracts or that it can demonstrate that its HR practices comply with all legislative requirements.	The company collects evidence that all employees, not matter which country they are employed in, have conditions of contracts which comply with all applicable legislation. It also demonstrates that each worker has an entitlement to earn a legal minimum wage. That each person receives a payslip which records how much NI is paid, where applicable all tax is collected and they have a PAYE reference number. That each person where applicable is entitled to annual leave, sick leave, maternity and paternity leave. The company ensures that it is employing all workers in accordance with the ILO and its convention for protecting all rights of vulnerable workers or child labour.	As level 1 <b>AND</b> the company also profiles all its workers against the employment criteria. It has robust assessment tools included in its HR and Procurement processes to ensure that all workers rights and freedoms are included in its practices and contracts. This will include compliance to legislation which deals with travel, accommodation, welfare, all leave entitlements and can confirm that every one employed is on or above the minimum wage. The company also has an accessible grievance process.	As level 2 <b>AND</b> if no legal minimum wage is set, that the company have calculated and set a "Fair Wage" or living wage using local benchmarking data. If no local legal requirements are adequate, that the company have put plans in place to improve workers lives	As level 3 <b>AND</b> the company can demonstrate that they have actively improved the lives and wellbeing of any workers who were subject to non-compliant practices in the reviews and has either been recognised formally to have demonstrated best practice or has been subject of case studies to inform others as to best practice

Immigration	The company does not have any documented evidence that they can comply with the requirements of the Immigration Office in the UK.	The company can demonstrate that it complies with the requirements of the UK Immigration, Asylum and Nationality Act 2006. But it cannot adequately demonstrate any compliance for other countries it operates in (where applicable).	The company can demonstrate that it complies with the requirements to achieve Level 1 <b>AND</b> it can demonstrate compliance for other countries it operates in regarding local immigration legislation. The company operates a without prejudice whistle blowing policy that is communicated widely.	The company can demonstrate that it complies with the requirements to achieve Level 2 <b>AND</b> it has robust assessment tools included in its HR and procurement processes/procedures to ensure that all workers rights are included in its practices so as not to impact on the health and safety of any persons. If the company uses a 'code of practice' for suppliers this is monitored and verified.	The company can demonstrate that it complies with the requirements to achieve Level 3 <b>AND</b> the company has processes/procedures in place to improve the workers lives if they have been subject to trafficking as a direct result of non-compliance with any immigration law in the countries it operates and that the company has worked closely with the relevant authorities to bring to justice those who acted illegally.
Procurement	The company has specific policies and procedures to cover its procurement activities (goods, services and works) and address ethical sourcing of labour.	Baseline requirements fulfilled <b>AND</b> the company does not procure any goods and services from third parties <b>OR</b> The company does procure goods and services from third party organisations, it has policies and procedures to address its procurement activities and carried out a risk assessment of procurement <b>AND</b> operates a verified code of conduct for its suppliers and has an approved supplier list	Level 1 requirements fulfilled <b>AND</b> the company has mapped its supply chain and when procuring from outside of the UK it can demonstrate that its procedures have been enhanced to cover the increased risk posed from sourcing to ethical labour standards, delivering on key performance indicators/ metrics.	Level 2 requirements fulfilled <b>AND</b> where suppliers are found to have been non-compliant in relation to the protection of workers rights they have been identified and addressed and support plans in place to address non compliance  Increased risks in relationship to procuring from high risk regions and or commodities from around the globe were identified and the company is carrying out extra activity to manage its increased risks .	Level 3 requirements fulfilled <b>AND</b> the company is seen to be leading their sector in advancing procurement practices , developing supply markets for responsibly sourced products and incorporating ethical labour considerations in supply chain development.
Supply Chain Management	The company does procure from other sources but does not administer any provisions in relation to the legal requirements of workers rights or ethical labour as part of its supply chain management policies and procedures	The company does procure from other sources and it has provisions in its tenders and contracts for the sub letting of work and also a basic requirement to address legal compliance (such as Companies Act, MSA, Bribery and Corruption, Immigration, Equality etc), but it does not administer any forms of audit or monitoring to check compliance	As level 1 <b>AND</b> It does assess its supply chain performance in relations to compliance to legislative requirements against the MSA and other ethical labour standards and also carries out training with its supply chain	As level 2 <b>AND</b> It also conducts third party audits of its supply chain and acts upon any non-conformances or observations identified	As level 3 <b>AND</b> It can demonstrate that it has taken active steps to improve the rights and conditions of workers from a non domestic market and can be seen to be leading their sector in advancing procurement practices, developing supply markets for responsibly sourced products and incorporating ethical considerations in supply chain development.

Bribery	The company does not have any documented evidence in relation to complying with the Bribery Act 2010	The company does have a policy for Anti Bribery and Corruption and it has reviewed its processes to comply with the Bribery Act 2010. It also provides training to 100% of its staff and its supply chain to ensure they are aware of the legal obligations under the act (relevant to job role).	As level 1 <b>AND</b> Potential illegal acts are investigated and reported fully. The company operates a whistle-blowing policy which also protects those who come forward. Bribery is part of their corporate risk register.	As level 2 <b>AND</b> the company can demonstrate how they have taken action when issues have been identified and raised (or how they would if a situation arose)	As level 3 <b>AND</b> The company can demonstrate how they have taken action when issues have been identified and raised and as a result the company can demonstrate how they have taken a positive action to drive out any anti bribery, corruption, fraud or malpractice activity in their business dealings no matter where they operate and with whom they operate. Evidence of sharing good practice to support others is a level 4 requirement
Learning & Development	The company does not train key groups of staff in the legal requirements of the 4 relevant acts listed within this standard	The company does train its staff in the legal requirements of the MSA act but does not deliver any other training on the Equality Act 2010, Bribery Act 2010, Immigration, Asylum and Nationality Act 2006	The company does train its staff in the legal requirements of the Acts . It operates outside of the UK and therefore gives basic training tools to train and develop its staff in other locations in relations to the relevant Act to protect Workers and also deal with Modern Slavery	As level 2 <b>AND</b> It also has a set of assessment tools to understand what additional risks it has by operating in non domestic countries and gives a more detailed training to relevant staff on the specific risks associated with working in there markets in those locations	As level 3 <b>AND</b> The company can also demonstrate how they are having a positive impact in their market to go above and beyond to train their staff on the subject of workers rights and eradicating modern slavery, and still retaining a competitiveness within the market.
Forums	The company does not operate any forums or committees in relation to adopting and learning how to deliver Ethical Labour or eradicating Modern Slavery	The company does operate a forum (or Trade Union or equality forums etc) and part of the remit of the forum is to advise and debate on Ethical Labour and eradicating Modern Slavery	The company has evidence that it operates a forum (with a specific item) on the subject of Ethical Labour and Modern Slavery and it comprises both internal and external representatives where at least 1 person is considered a subject matter expert on workers rights and conditions	As level 2 <b>AND</b> the company is involved in external multi-stakeholder initiatives, associations and fora. For best practice this should include engagement with relevant NGOs and the trade unions either locally or internationally.	As level 3 <b>AND</b> It also has evidence where it has created or learnt from best practice and can be seen to be a market leader in the field of Ethical Labour and has influenced a Client to change their behaviour in regards to Ethical Labour and eradicating modern slavery
Reporting	The company has evidence that it provides a statement/ report in accordance with the MSA reporting requirements if meeting the £36m threshold	The company does issue a report on its website and the statement made is in compliance with the MSA, even if it is below the £36 m threshold which demonstrates continual improvement	As level 1 <b>AND</b> The company also has an action plan to determine how it will improve on its performance in relation to the subject of Ethical Labour or eradicating Modern Slavery and that it monitors and measures progress on a regular basis	As level 2 <b>AND</b> It has also elevated certain identified risks into its company risk register and is actively engaged in working to improve the lives and the wellbeing of its workers	As level 3 <b>AND</b> The company can demonstrate that it can hold itself accountable to the highs standards as a result of its activities in relations to MSA and Ethical Labour standards





