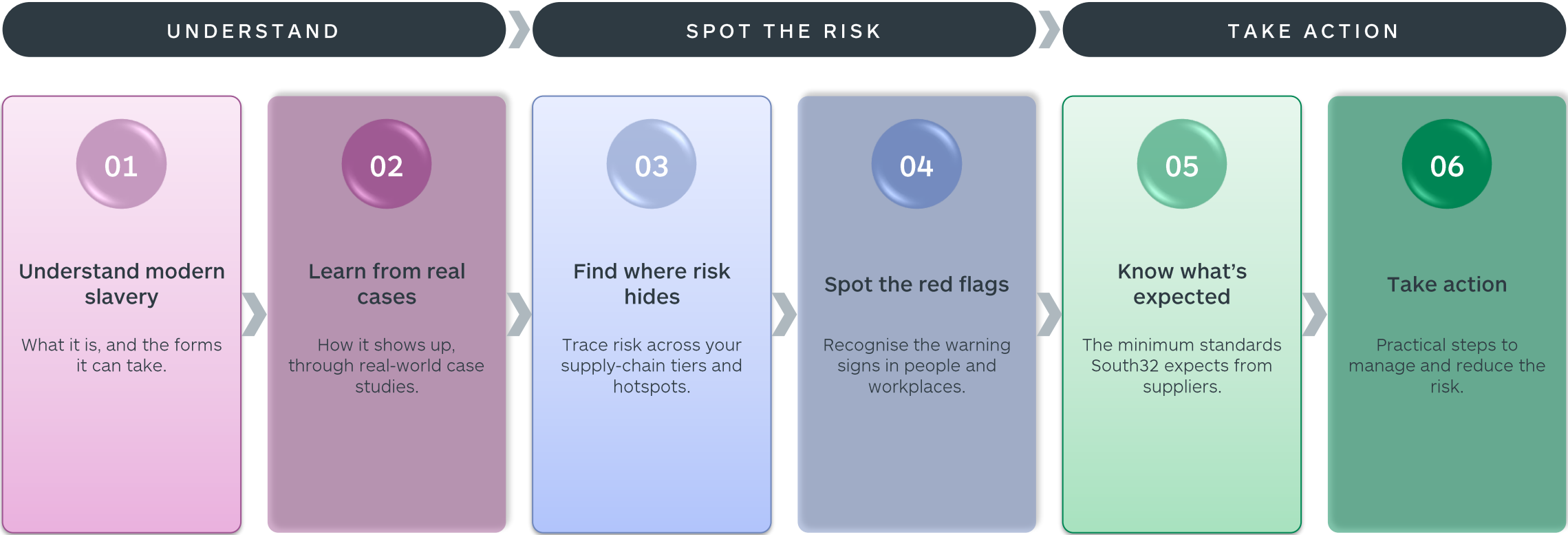


MODERN SLAVERY

Training for Suppliers

INTRODUCTORY MODERN SLAVERY TRAINING

Understand modern slavery, learning the red flags and embedding practical steps to address in your business.



Watch to start

ILO: One in every 150 people are trapped in modern slavery

MODERN SLAVERY

South32 defines modern slavery as set out in Australian legislation

Modern slavery: is at the extreme end of the labour rights spectrum.

Labour rights respected

- Freely chosen, contracted work
- Fair wages, paid in full and on time
- Safe workplace, reasonable hours
- Free to leave, unionise and speak up

Labour rights not respected

- Underpayment or unpaid overtime
- Poor rostering or excessive overtime
- Uncomfortable but safe conditions
- One-off breaches of employment law

Modern slavery – severe human rights violations

- Threats, deception and/ coercion
- Cannot leave or refuse work
- Wages withheld, deducted for 'debt', or paid to a third party
- Isolation, restricted movement

Modern slavery: situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.



Trafficking in persons – the recruitment, transportation, transfer, harbouring or receipt of a person by means including coercion, threat, fraud and abduction for the purpose of exploitation.



Debt bondage – when a person is forced to work to pay off a debt or loan which is used as a form of coercion or control. The person is often tricked into working for little or no pay and may have no control over the level of debt.



Forced marriage – where a person is married without their free and full consent because of coercion, threat, deception or because they are incapable of understanding the nature and effect of the marriage ceremony.



The worst forms of child labour – where children are subjected to slavery or slavery-like practices, or engaged in hazardous work that harms their health, safety in development

Forced labour – when a person is forced to work against their will or under threat of punishment.



Slavery – when a person tries to exercise 'ownership' over another or when a person is treated like an object which can be bought, sold or traded.



Servitude – when a person does not consider themselves free to stop working or to leave their place of work because of coercion, threats or deception.



Deceptive recruiting for labour or services – recruiting someone by deception about the nature of the work, pay, conditions, or the extent of any debt owed.



CASE STUDIES

MODERN SLAVERY IN PRACTICE: CASE STUDIES

01 Asia · Thai fishing & seafood

What happened: Thousands of migrant fishers were held at sea in debt bondage, with passports confiscated and wages withheld.

Warning signs: Recruitment debt, retained IDs, long stretches at sea, migrant-only crews.

Action & outcome: Thailand passed new anti-forced-labour fishing laws (2019); through the ILO Ship to Shore Rights programme, inspections, worker voice and access to justice improved — progress remains uneven.

[Source & film: ILO — Combatting Forced Labour in Thai Fishing](#)

02 United States · Florida farm labour

What happened: Migrant farmworkers on H-2A visas were forced to harvest produce under threat; some escaped captivity and alerted advocates.

Warning signs: Labour-hire intermediaries, debt, isolation, confinement.

Action & outcome: A contractor was convicted and sentenced to ~10 years; the worker-led Fair Food Program now binds major buyers to enforceable standards, worker education and independent monitoring.

[Fair Food Program — Coalition of Immokalee Workers](#) [Court evidence: U.S. Dept of Justice](#)

03 Global · Australia · UK · Facilities management & cleaning

What happened: Migrant cleaners were charged recruitment fees and subjected to employer-controlled housing, excessive hours and wage deductions across layers of subcontracting.

Warning signs: Cheap contracts, accommodation or uniform deductions, excessive hours, sham ABN contracting.

Action & outcome: The Fair Work Ombudsman took ProClean HQ to court over \$125,565 in sham-contracting underpayments (2023); a UK owner was jailed for trafficking Brazilian cleaners (2026); the Cleaning Accountability Framework now drives buyer assurance.

[CAF — Modern Slavery in Cleaning](#) [Evidence: Fair Work Ombudsman — ProClean case](#)

04 South Africa · Sugarcane harvesting

What happened: Research into South Africa's sugarcane supply chain found child-labour and exploitation risks, with children from poor rural communities drawn into seasonal harvesting through informal brokers.

Warning signs: Children at farm sites in school hours, informal brokers, undocumented workers, no age-verification records.

Action & outcome: The Department of Employment & Labour partnered with the ILO to train communities and employers to spot child labour, and ran a blitz of targeted farm inspections — rated 'minimal advancement' in 2024.

[Evidence: U.S. Dept of Labor — Findings on Child Labor in South Africa](#)

Videos & further material: [Australian Red Cross — 'Hidden in plain sight'](#) [Anti-Slavery International — video library](#) [Anti-Slavery Australia — survivor stories](#)

CASE STUDY 01: THAI FISHING & SEAFOOD

Adapted from *ILO Ship to Shore Rights & Human Rights Watch – Hidden Chains (2018)*

SOUTH-EAST ASIA · FISHING & SEAFOOD



Debt
bondage



Forced
labour



Deceptive
recruitment

What happened

Migrant fishers from Cambodia, Myanmar and Lao PDR were recruited onto Thai commercial fishing vessels. Recruitment fees created debts that took months to clear. Passports were confiscated by boat owners, wages withheld, and workers kept at sea for months at a time – unable to leave or seek help.

In 2015, the EU issued Thailand a "yellow card" warning over illegal fishing linked to forced labour.

Human Rights Watch's [Hidden Chains](#) report (2018) documented ongoing abuses. Thailand ratified the ILO Forced Labour Protocol (P29) in 2018 – the first country in Asia to do so – and reforms through the ILO/EU [Ship to Shore Rights](#) programme strengthened inspections, vessel monitoring and worker voice. Progress remains uneven.

Red flags in this scenario

-  Worker-paid recruitment fees creating debt
-  Passports and IDs held by boat owners or brokers
-  Wages withheld or paid to a third party
-  Long periods at sea without shore leave

What you can do

- Verify no worker-paid recruitment fees at any tier – employer pays
- Ask suppliers how migrant workers are recruited and whether brokers are used
- Require direct wage payment into each worker's own bank account



WATCH [Hidden Chains: Thai Fishing](#)
Human Rights Watch · 2 min

ADDITIONAL INFORMATION

- [HRW Report](#)
- [ILO Ship to Shore Rights](#)
- [Al Jazeera: Thai fishing industry \(video, 2 min\)](#)

CASE STUDY 02: FLORIDA FARM LABOUR

Adapted from [Coalition of Immokalee Workers – Fair Food Program](#)

USA · AGRICULTURE & LABOUR HIRE



Debt
bondage



Forced
labour



Deceptive
recruitment

What happened

For decades, migrant farmworkers in Florida's tomato and produce sector – many on temporary H-2A visas – faced wage theft, sexual violence and, in the most extreme cases, forced labour.

Labour-hire contractors recruited workers, controlled their transport and housing, and held wages against inflated debts. Federal prosecutions between 1997 and 2010 resulted in convictions for what U.S. prosecutors described as "modern-day slavery in the fields".

In 2011, the [Coalition of Immokalee Workers](#) launched the [Fair Food Program](#) – a worker-driven model where buyers (McDonald's, Walmart, Whole Foods) pay a Premium and only source from growers who comply with a worker-informed Code of Conduct. It includes a 24/7 hotline, independent auditing and worker-to-worker education.

Red flags in this scenario

-  Labour hire contractor controls housing and transport
-  Recruitment fees or transport debts owed to broker
-  Restricted movement, isolated worksites
-  Wages paid via broker, not direct to worker

What you can do

- Know who your labour hire firm is – and who they sub-contract to
- Contract directly with workers where possible
- Provide a worker voice channel independent of the employer or broker



WATCH [The Fair Food Program](#)
[Coalition of Immokalee Workers · 3 min](#)

ADDITIONAL INFORMATION

- [Fair Food Program](#)
- [Food Chains documentary](#)
- [ProPublica: H-2A farm labour \(video\)](#)

CASE STUDY 3: FACILITIES MANAGEMENT AND CLEANING

Adapted from [Cleaning Accountability Framework \(CAF\)](#) · [Fair Work Ombudsman](#) · [UK Modern Slavery cases](#)

GLOBAL · FACILITIES MANAGEMENT


 Debt bondage


 Forced labour


 Deceptive recruitment

What happened

Investigations by the [Cleaning Accountability Framework \(CAF\)](#) have documented workers on temporary visas paying recruitment fees, being housed in employer-controlled accommodation, working excessive hours, and having wages deducted for transport, uniforms or accommodation – often across multiple layers of subcontracting.

Cleaning is one of Australia's most vulnerable and exploited sectors, employing over 120,000 people – predominantly migrant workers. In 2023, the Fair Work Ombudsman took [ProClean HQ](#) to court over Sri Lankan and Nepalese student-visa cleaners at Sydney Trains' Auburn Maintenance Centre – underpaid \$125,565 through sham contracting.

In 2026, UK courts jailed a cleaning company owner for trafficking Brazilian workers into 12-hour shifts in Luton, where their only "payment" was accommodation.

The pattern is consistent: cleaning sits at Tier 2 or Tier 3 in most FM supply chains, with cheap contracts driving wage suppression, sham contracting and exploitation of migrant workers – often invisible to the building owner or head contractor.

Red flags in this scenario

-  Cheap contracts – price below the true cost of decent work
-  Recruitment fees, accommodation or uniform deductions
-  Excessive hours (early mornings, late nights, weekends)
-  Workers on ABNs or sham contracts, unclear on employment terms

What you can do

- Ask who actually cleans your buildings – and who employs them
- Use CAF-certified contractors or require CAF-aligned assurance
- Benchmark cleaning contract price against a fair-work pricing tool



READ [Ending Exploitation in Cleaning](#)
[Cleaning Accountability Framework](#)

ADDITIONAL INFORMATION

- [CAF – Modern Slavery in Cleaning](#)
- [FWO: ProClean case](#)

CASE STUDY 4: SOUTH AFRICA AGRICULTURE

Adapted from [U.S. Department of Labor – 2024 Findings on the Worst Forms of Child Labor](#)

SOUTH AFRICA · SUGARCANE HARVESTING



Child labour



Forced labour

What happened

Research into South Africa's sugarcane supply chain identified risks associated with child labour and labour exploitation despite strong legal protections.

Children from vulnerable rural communities may be drawn into agricultural work through informal labour arrangements, while migrant workers can be particularly vulnerable to exploitation. Studies note that poverty, seasonal labour demand and weak oversight in some rural areas increase the risk of child labour occurring in agricultural supply chains.

The South African Government and International Labour Organization have undertaken targeted initiatives, including community awareness programs and inspections in agricultural areas.

However, child labour remains a concern in some rural communities, particularly where labour is recruited informally or where economic pressures affect families.

Red flags in this scenario

-  Children present or working at farm sites during school hours
-  Seasonal labour recruited through informal brokers.
-  Migrant or foreign-born workers with limited documentation.
-  No age-verification records for workers.

What you can do

- Require suppliers to verify workers' ages and maintain records.
- Ask suppliers how seasonal workers are recruited and managed.
- Review labour broker arrangements and monitor higher-risk recruitment practices.
- Seek assurance that children are not engaged in harvesting or associated farm activities.



READ [ILO: South Africa's Fight Against Child Labour](#)

ILO · Report overview

ADDITIONAL INFORMATION

- [Behind the Veil](#)
- [Coca-Cola Company review of child labour](#)
- [How sugarcane was built on a global system of slavery](#)

WHAT YOU CAN DO

BE AWARE OF WHERE MODERN SLAVERY MAY BE PRESENT

Modern slavery risk can arise anywhere – but is often highest in indirect and deeper tiers, where visibility is lowest

YOUR WORKFORCE <i>Direct employees</i> You control hiring, wages, hours, safety, grievance channels. HIGH VISIBILITY	YOUR DIRECT SUPPLIERS <i>Indirect / labour hire / contractors</i> You choose them and set contracts. You should know how they recruit and treat workers. MEDIUM VISIBILITY	INDIRECT SUPPLIERS <i>Sub-contractors, sub-suppliers</i> You may not know who works here. Risk is often highest and hardest to see. LOW VISIBILITY
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Common risk hotspots

- Wages paid in cash, delayed, or with unexplained deductions
- Passports, visas or ID documents held by employers or labour agents
- Seasonal or peak-demand hiring filled through informal or unlicensed brokers
- Contractor-provided accommodation or transport
- Long or opaque sub-contracting chains
- Suppliers under aggressive cost or timing pressure

Indirect suppliers can be higher risk

- Harm usually happens not with the supplier you contract, but the ones they use
- The riskiest work is often sub-contracted – cleaning, security, catering, transport, labour hire, PPE
- Small suppliers rely on sub-contractors too – size doesn't remove the risk, it can hide it
- If you don't know who does the work and how they were paid, you can't manage the risk

BE AWARE OF WHAT TO LOOK FOR

Warning signs can look different in every situation

MISLED OR TRAPPED

The person may have been promised one thing but ended up in a different or harmful situation.

Examples you might notice

- ▶ Does not understand their contract, pay or who actually employs them.
- ▶ Wages are withheld, very low, or reduced by deductions they cannot explain.
- ▶ Says they owe money to a recruiter, employer or labour agent.
- ▶ The job, location or accommodation is different to what was promised.

CONTROLLED OR ISOLATED

The person may not be able to make ordinary choices for themselves or speak safely.

Examples you might notice

- ▶ Someone else holds their passport, ID, phone, keys or bank card.
- ▶ Always transported, watched or spoken for by another person.
- ▶ Avoids questions, seems rehearsed, or cannot speak privately.
- ▶ Has limited contact with family, community or other workers.

UNSAFE OR EXPLOITED

The person may be working or living in conditions that are unsafe, unfair or harmful.

Examples you might notice

- ▶ Working excessive hours with little rest or no real time off.
- ▶ Living in crowded or employer-controlled accommodation.
- ▶ Missing proper safety equipment, training or access to medical care.
- ▶ Treated worse because of who they are or their situation.

WHAT SOUTH32 EXPECTS FROM SUPPLIERS

These are the minimum standards we expect from everyone who works with us, or on our behalf.

01

No forced labour or child labour

No forced, bonded or involuntary labour, and no labour acquired through human trafficking. No child labour at any time. Workers are free to leave employment.

02

Fair recruitment

The supplier must ensure wages and benefits (including overtime) paid for a standard working week, must satisfy, at a minimum, national legal standards, or local industry benchmarks. At all times working hours must meet minimum requirement and overtime be voluntary.

03

Fair pay and working conditions

Wages, benefits and working hours meet legal standards or industry benchmarks. Overtime is voluntary and fairly compensated.

04

Workers can speak up

Adopt an open attitude to legitimate trade union activity. Provide a clear, transparent grievance mechanism for workers to raise concerns.

05

Know who is working for you

Maintain a robust supply chain risk assessment process to identify and mitigate modern slavery risks in your own operations and suppliers.

06

Report concerns

Raise business conduct concerns through your local channel, a South32 Supply team member, or South32 Speak Up (EthicsPoint).

WHAT YOU CAN DO



Understand your risks

Things to consider

- What does modern slavery look like in our industry?
- Where are our higher-risk suppliers, workers or locations?
- Could our business be affecting people negatively?

Practical steps

- Know your main suppliers, and ask them who they use.
- Look hard at higher-risk areas: cleaning, security, food, uniforms, PPE, freight.
- Ask suppliers to complete a modern slavery risk questionnaire.



Set clear expectations

Things to consider

- How do we recruit workers?
- What expectations do we communicate to suppliers?
- Do we screen suppliers before engaging them?

Practical steps

- Write a short anti-slavery statement into your supplier code of conduct and contracts.
- Share your rules with suppliers and sub-contractors.
- Add modern slavery requirements and a right-to-audit clause to tenders.



Check and take action

Things to consider

- Where are workers most vulnerable?
- What protections are in place?
- Are we addressing causes, not just symptoms?

Practical steps

- Check no one paid to get their job
- Check no one is holding a worker's passport, ID or bank card.
- Verify wages are paid directly into each worker's own account.
- Ask how workers were recruited, and whether any fee was paid.



Learn and collaborate

Things to consider

- Who needs training in our business?
- Who makes purchasing and hiring decisions?
- Who can help us understand risks better?

Practical steps

- Train the people who hire workers and buy things.
- Visit worksites and speak with workers directly, away from managers or recruiters, using interpreters if needed.
- Report any concern straight away — one warning sign can be enough.



Keep improving

Things to consider

- Were our actions effective?
- What have we learned?
- How can we strengthen protections for people?

Practical steps

- Make sure your team knows your position and lives it day to day.
- Review what's working each year and strengthen your protections.
- Keep records of your checks and actions as evidence of due diligence.

SOUTH32 APPROACH

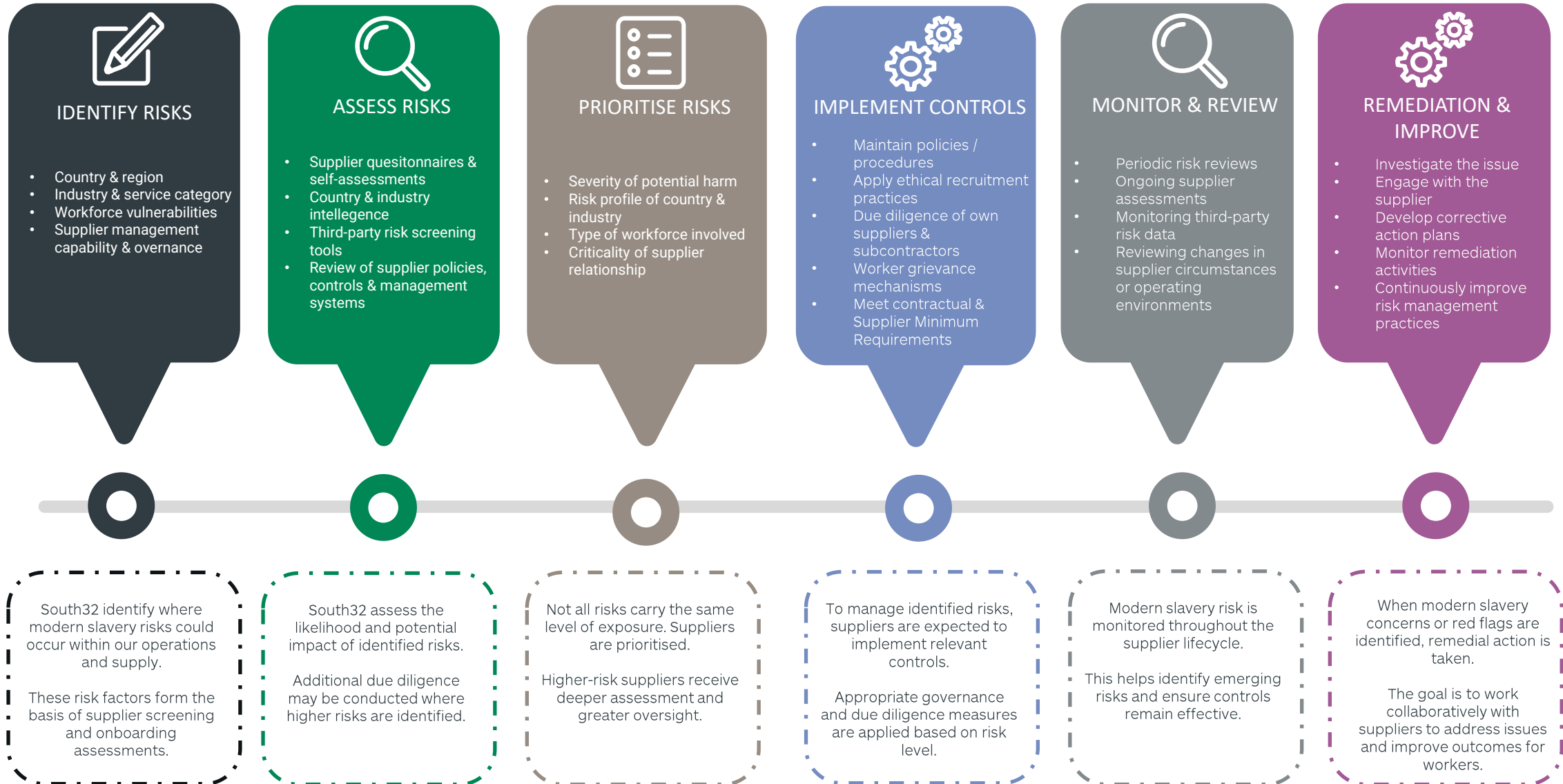
SOUTH32 APPROACH TO MODERN SLAVERY

Guided by the UN Guiding Principles on Business and Human Rights, our approach to managing modern slavery risk is to:

- **Identify risks**
- **Assess risks**
- **Prioritise the most severe risks**
- **Implement appropriate controls**
- **Monitor and review performance**
- **Remediate and improve where concerns are identified.**

We expect you to apply this same risk-based approach within your own operations and supply chains – identifying your risks, setting clear expectations for your own suppliers and subcontractors, and acting where something is not right. See the ‘What you can do’ steps earlier in this pack for practical actions.

MODERN SLAVERY DUE DILIGENCE



USEFUL RESOURCES

Australia	United Kingdom	South Africa	Civil society organisations
<u>Australian Red Cross – Modern Slavery resources</u> Guides, videos, posters & business guide <u>Red Cross & SBS Modern Slavery Training</u> Free 4-module introductory course <u>Australian Government resources</u>	<u>Home Office – Transparency in Supply Chains: A Practical Guide</u> Statutory guidance & practical steps <u>Unseen UK – Anti-Slavery Business Resources</u> Free SME toolkit & self-assessment	<u>Stronger Together South Africa</u> Template policies & training (EN/AF) <u>S2G – Forced Labour Toolkit</u> Step-by-step agri-business guide <u>CMS Expert Guide – Forced Labour in South Africa</u> Plain-English legal overview	<u>Walk Free – Modern Slavery Business & Investor Toolkit</u> Case studies, learning modules & a self-assessment benchmarking tool <u>Anti-Slavery International – Reports & Resources</u> Free awareness resources, policy briefings & practical guidance <u>Responsible Sourcing Tool (RST)</u> 12 due-diligence tools aligned to the UNGPs and OECD guidance <u>Good Practice Toolkit – Strengthening Modern Slavery Responses</u> Coalition of nine academic & civil society bodies; supplier & worker engagement <u>The Freedom Hub</u> Rights-based guidance on grievance mechanisms & worker voice <u>Informed 365 – Strengthening Grievance Mechanisms</u> The 8 essential elements of an effective grievance mechanism

Global: [Stronger Together \(global tools & e-learning\)](#) · [ILO – forced labour resources](#)

