

Modern Slavery Benchmarking Tool

Performance Results and Recommendations

ID: 352

Country: germany

Industry: technology-communications

Score: 22

Total possible score: 30

Referrer: <https://www.walkfree.org/resources/>

Report URL: <https://cdn.walkfree.org/exports/modern-slavery-report-240207-100222-5259.html>

Created at: 2024-02-07 18:02:22

Survey ID: 24990

QUESTION: Responsibility

How can we improve? Not Applicable

QUESTION: Strategy

How can we improve? Not Applicable

QUESTION: Policy Commitment

How can we improve? Not Applicable

QUESTION: Policy Implementation

How can we improve? Not Applicable

QUESTION: Reporting

How can we improve?

Identify the specific type of modern slavery risks if possible (such as forced labor, child labor, debt bondage, deceptive recruitment practices, etc), where it occurs in your operations and value chain, what its relevant indicators are (such as loss of freedom of movement, failure to check worker age, payment of recruitment fees, or complaints about contract substitution, etc), and whether you cause, contribute or are directly linked to the risk.

Prioritize the salient risks in your modern slavery risks for attention based on severity and likelihood:

- Assess the severity of the impact on the people affected, considering how grave the impact would be, how widespread (i.e., how many people would it affect) and how hard it would be to remediate the resulting harm; and,
- Consider the likelihood of risk occurring (noting that the most severe risks should be prioritised even if there is a low likelihood of occurring).

QUESTION: Risk Assessment

How can we improve?

Assess employment practices to ensure workers do not face exploitative treatment, making them vulnerable to modern slavery. Identify any practices that need to be improved.

The full list of checklist questions asked are included below for your reference.

- Are workers paid a living wage?
- Are workers paid their wages and other benefits on time?
- Are workers required to work excessive overtime?
- Do workers pay recruitment fees or other fees to get the job?
- Are workers in situations of debt bondage?
- Do workers have safe and sanitary working and living conditions?
- Do workers have contracts in a language they understand?
- Do workers have access to passport/ID documents at all times?
- Are workers free to leave their employment or accommodation at all times?
- Do we ensure workers' interests are adequately represented, including by respecting worker rights to join trade unions or workers associations?
- Are all workers' ages checked and child labor prevented?
- Does discrimination occur in the workplace?

QUESTION: Our Employment Practices

How can we improve?

Design and implement an ongoing due diligence process for assessing and addressing modern slavery risks that is approved by the Board and communicated to employees and suppliers. This involves identifying modern slavery risk and incident, taking action in response to what is identified, tracking responses to make sure they are working, and communicating how risk and incidents are addressed. Reporting, policies and risk assessment have been covered above and are part of this process.

Monitoring should be added to build a complete due diligence approach including:

- Asking suppliers questions about their workforce, worksites, labor practices, policies and processes for preventing forced and child labor (e.g. Self-Assessment Questionnaires);
- Visiting the supplier's site or facilities;
- Conducting a social audit;
- Engaging with their workers through surveys, interviews, or other technology such as mobile phone apps (this may be conducted as part of an audit or, ideally, established as a channel for ongoing communication with workers);
- Using other risk assessment tools e.g. traceability and risk mapping tools;
- Engaging with a civil society organization(s) to support understanding of risks.

QUESTION: Supplier engagement and due diligence

How can we improve? Not Applicable

QUESTION: Purchasing practices

How can we improve? Not Applicable

QUESTION: Grievance mechanisms

How can we improve?

Establish a grievance /complaints process (grievance mechanism) communicated to internal and external stakeholders that meets the following standards:

- It can be used to receive, resolve and remedy labor exploitation and modern slavery-related complaints; and,
- It is effective; i.e., it is accessible, predictable, fair, rights-based, transparent, confidential or anonymous, and it bans retaliation or reprisal. Consider whether parties know the mechanisms exists, can access it in their own language and can raise grievances anonymously.

Consider involving external stakeholders in its design and communication such as suppliers, workers and civil society organizations.

QUESTION: Response and Remediation

How can we improve? Not Applicable