

Modern Slavery Benchmarking Tool

Performance Results and Recommendations

ID: 201

Country: united-states

Industry: technology-communications

Score: 25

Total possible score: 30

Referrer: <https://www.google.com/>

Report URL: <https://cdn.walkfree.org/exports/modern-slavery-report-230725-145004-3791.html>

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QUESTION: Responsibility

How can we improve?

Adopt and publish policies that set out the organization's commitment to and principles/standards for addressing modern slavery. These may include:

- Human Rights Policy, Modern Slavery Policy and/or Forced and Child Labor Policy
- Ethical Recruitment Policy and/or Employer Pays Principle
- Procurement Policy and/or Supplier Code of Conduct (including provisions on modern slavery)
- Human Resources policies including complaints handling policy
- Grievance Mechanism and Whistleblower Policy
- Investment Policy or Framework
- Remediation Policy or Framework

QUESTION: Strategy

How can we improve? Not Applicable

QUESTION: Policy Commitment

How can we improve?

Establish how the organization will report publicly on modern slavery risks and incidents, including complying with legal reporting obligations.

QUESTION: Policy Implementation

How can we improve? Not Applicable

QUESTION: Reporting

How can we improve? Not Applicable

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? Not Applicable

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? Not Applicable

QUESTION: Response and Remediation
How can we improve?

Develop a remediation framework that clearly sets out steps to take to investigate and remediate a breach or an incident. It involves:

- responding to individuals that have been harmed; and,
- preventing and mitigating potential harms.

Investigation includes collecting and verifying information (ensuring witnesses or interviewees are protected from retaliation or reprisal), identifying if harm has occurred and developing responses to address it.

Consider these principles as part of the framework:

- Remediation should aim to “make good” the harm and restore the individual or group to the position they were in before suffering harm. This may involve a range of actions, such as facilitating access to health, legal or psychosocial services, repatriation or financial compensation.
- Your role in providing remediation will depend on how you are connected to the harm – i.e., whether your activities caused, contributed to or were directly linked to it. It may involve providing remedy directly or using your leverage to require others to take action.
- Consider the channels by which breaches or incidents might be identified or received including due diligence and grievance mechanisms.

The remediation framework should also:

- Assign responsibility for leading and managing the framework;
- Ensure the executive and Board are kept informed throughout the process;
- Require reviewing the breach or incident following remediation to identify lessons learned and the mitigation and prevention actions required, including ongoing due diligence regarding the risks related to the breach or incident.