

# Navigating the Complexities of Supply Chain Ethics: Strategies for Addressing Human Rights Abuses and Forced Labor

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People living in conditions of modern slavery in Africa

3.9 million

***Where do we find support to  
navigate the complexities of supply  
chain ethics?***

## Legal and Regulatory Frameworks

### International Standards:

- Overview of international laws such as the UN Guiding Principles on Business and Human Rights (UNGPs) or the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals and Sustainable Development Goals (SDGs) etc.

### International Regulations:

- **South Africa (1997)** - Basic Conditions of Employment Act (BCEA), 1997
- **United Kingdom (2015)** – Modern Slavery Act
- **Nigeria (2015)** – Trafficking in Persons Enforcement and administration Act
- **Germany (2023)** – German Supply Chain Act
- **EU (From 2024)** – Corporate Responsibility and Sustainability Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CS3D)



# Strategies for Ethical Supply Chain Management



**DUE DILIGENCE & RISK  
ASSESSMENT**



**MULTI-STAKEHOLDERS  
INITIATIVES**



**PROMOTE  
TRANSPARENCY  
THROUGH THE USE OF  
TECHNOLOGY**



**STRENGTHEN  
SUPPLIER CONTRACTS**



**INVESTING IN  
CAPACITY BUILDING &  
TRAINING**

***‘We can’t manage, what we don’t  
measure’***

## Strategies to address human rights Risk Mapping

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### CASE STUDY

#### Human Rights Review, Southern Africa

On behalf of a multinational mining company, we conducted an on-the-ground review of the human rights and labour practices of a private security company operating throughout Southern Africa. We conducted in-country enquiries with former managers, labour union and community leaders, relevant government officials, and various experts. While we identified numerous historical human rights abuses relating to the company's operations, it became apparent over the course of our investigation that the company had since proactively implemented best-in-class practices as relating to human and labour rights.

## Strategies to address human rights Monitoring

Risk register is a useful tool to monitor human rights performance and can be used as your historical foundation to address the effectiveness of your Access to Remedy Plans by looking at severity, likelihood and control, and the robustness of current and potential mitigating actions.

- **Severity** (number and type individuals affected)
- **Scale** (gravity of impact)
- **Remediability** (ability to restore)
- **Likelihood** is based on exposure (how we are involved)
- **Context** (country/sector)
- **Mitigation** (existing actions of third party)

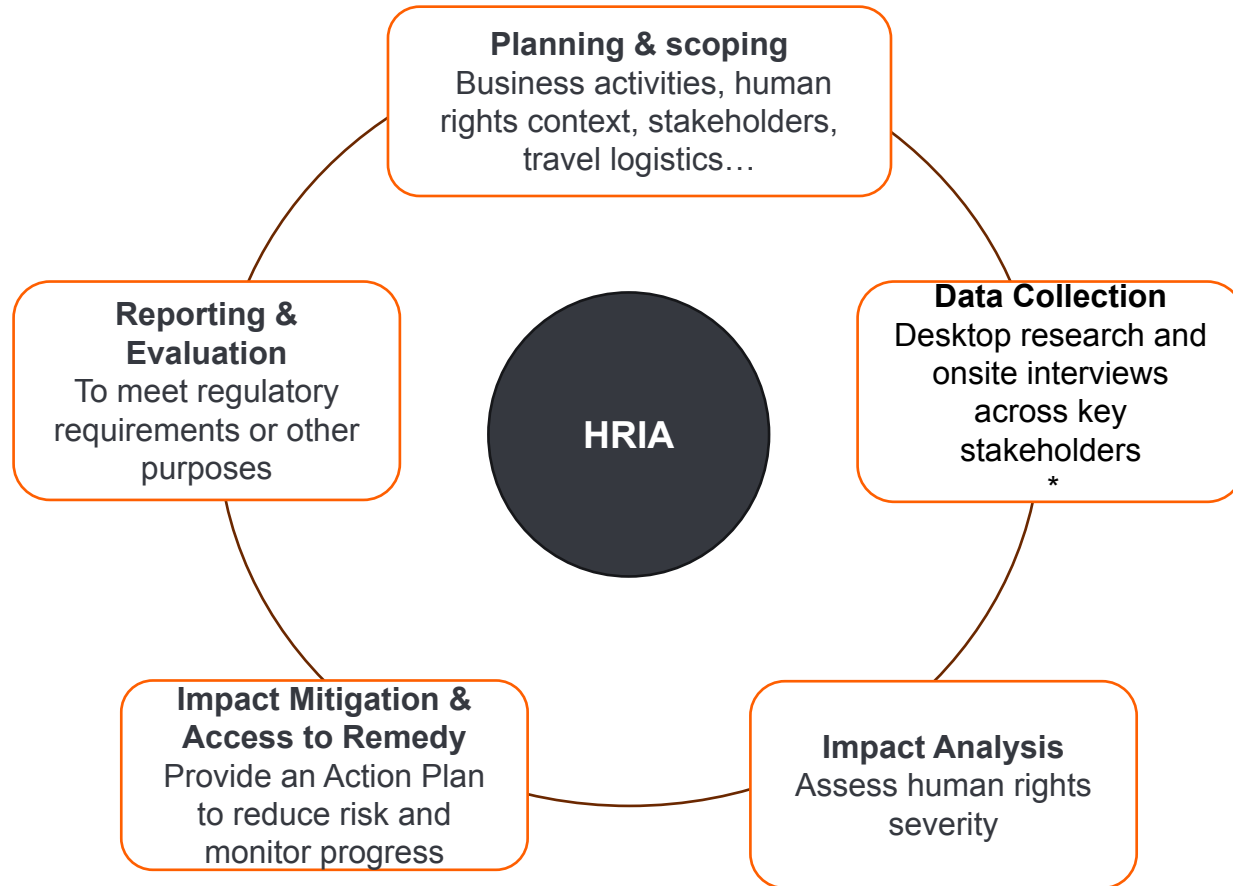
## CASE STUDY

### Human Rights Risk Register | DRC

On behalf of a global mining company we conducted a country risk assessment in the Democratic Republic of Congo ('DRC'), focusing on operational issues in the mining industry and associated environmental, social, and governance ('ESG') concerns. The investigation focused on producing an ESG and Human Rights risk register to monitor into the reputation and integrity risks affiliated with the mines and their respective operating companies for a series of both industrial open pit mines and smaller artisanal mines.

## Strategies to address human rights

### Human Rights Impact Assessments (HRIA)



## CASE STUDY

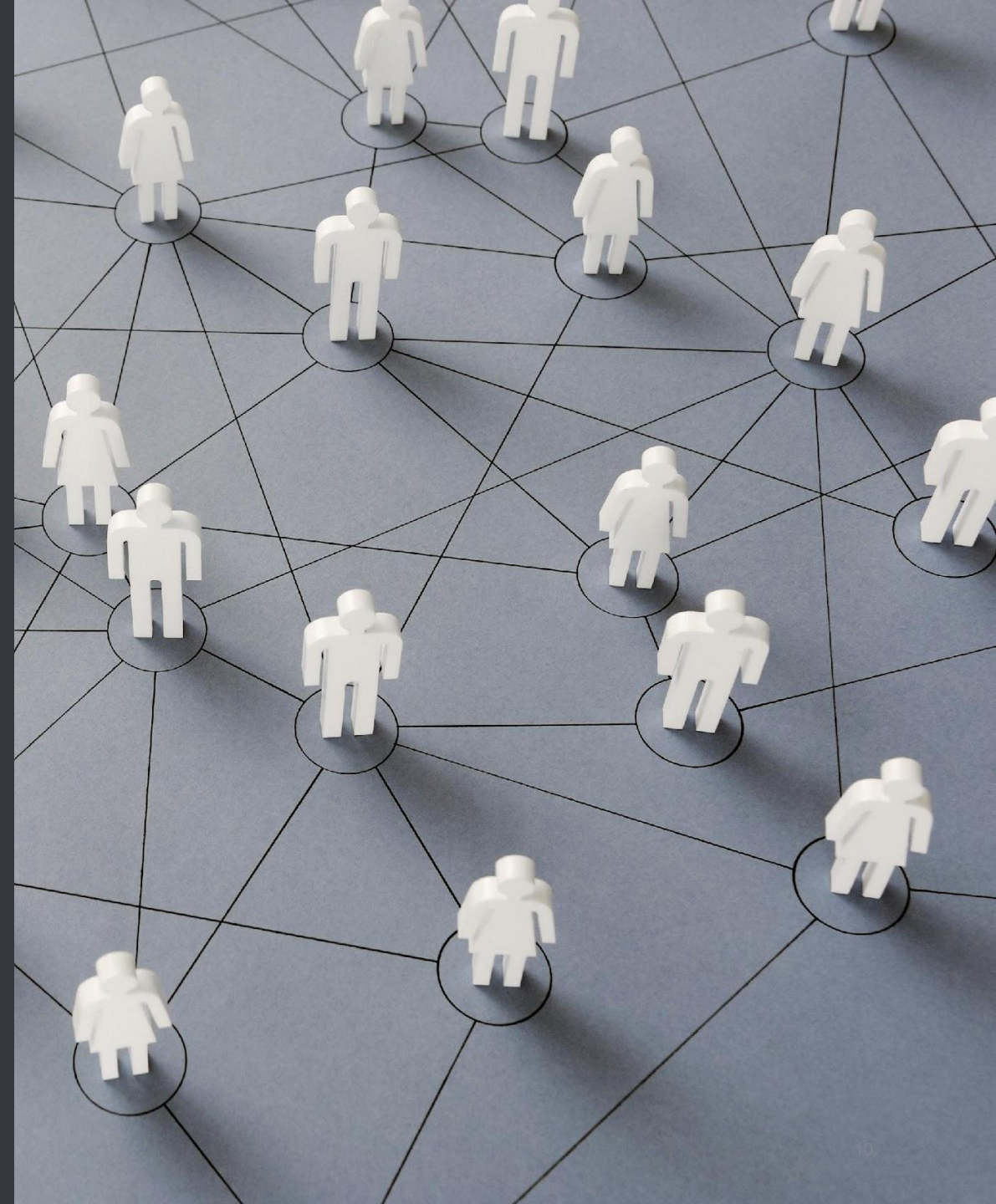
### Integrity & ESG Due Diligence, DRC and Zambia

On behalf of publicly-listed mining company, we conducted an on-the-ground HRIA into several mines in the DRC and Zambia owned by diverse mining companies. Our contacts close to the operations of the mining and processing sites of the companies identified them as some of the worst labour and environmental offenders in the Copperbelt region. Through a stakeholder engagement, these contacts spoke to ubiquitously poor labour practices, including provision of inadequate protective gear, and prohibition of labour union presence at the sites; the mining operators' alleged disregard of environmental laws, which saw the polluting of neighbouring community water supplies; and the widespread sourcing of ore from informal artisanal and small-scale mining practitioners, the provenance of which included exposure to child labour concerns.

## Key Indicators to identify Forced Labor and Human Rights Abuses – *What to look for...*

### Indicators:

- **Labor Practices:** Evidence of forced labor, such as withheld wages, retention of identity documents, restrictions on movement, wages of different workers being paid on the same account and agencies reputation.
- **Health and Safety Violations:** Lack of protective equipment, poor working conditions, or a high incidence of workplace accidents.
- **Worker Grievances:** Reports of complaints from workers regarding unpaid wages, excessive working hours, or unsafe conditions.
- **Community Complaints:** Local communities raising concerns about land rights, environmental degradation, or displacement.



# Speak to our experts



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