



Your partner  
in progress

# Modern Slavery and Human Trafficking

Transparency  
Statement 2025





# Introduction

Modern slavery is a violation of fundamental human rights and a crime. The British Standards Institution and its subsidiaries ('BSI') has a zero-tolerance approach to modern slavery and we are committed to identifying, addressing and preventing modern slavery in our operations and supply chains in a manner that puts concerns for potential victims at the centre. We understand modern slavery to encompass slavery, servitude, forced labour, human trafficking, sexual exploitation and child labour.

Whilst it is considered that the likelihood of modern slavery in our own organization is low, we are not complacent in this area and regard it as an area for continuous improvement and monitoring. We also know that modern slavery is at the extreme end of a spectrum of labour rights issues and that we need to address labour issues well before they reach the threshold of modern slavery.

This Statement sets out the steps we have taken during the 2024 financial year in support of this commitment, pursuant to section 54 of the Modern Slavery Act 2015 ('the Act'). It has been prepared for BSI and its subsidiaries and includes The British Standards Institution (the parent company of the BSI Group), BSI Assurance UK Limited and BSI Standards Limited which are the three UK companies required to prepare a modern slavery statement for each financial year.

To recognize and manage the risk of modern slavery in our operations, supply chains and wider operating environment, we refer to the guidelines of BS 25700:2022 Organizational Responses to Modern Slavery. This guidance is free to download, and it is helpful and beneficial to other organizations.

Find out more at:

[BS 25700:2022](#) | [30 Sep 2022](#) | [BSI Knowledge \(bsigroup.com\)](#)



# Our structure, business & supply chains

BSI was formed in 1901 and incorporated under Royal Charter in 1929. It is the oldest standards-making body in the world. BSI is independent of government, industry, and trade associations. By virtue of its constitution, it is a non-profit distributing company. BSI provides services worldwide to both the private and public sectors. BSI is home of the Kitemark.

BSI is a global business to business ('B2B') company having a presence on every continent, with offices in 30 countries across the world. Our clients range from globally recognized brands to small, local businesses. For FY 2024 BSI had revenue of £757.4m and the monthly average of full-time equivalent individuals employed was 6,142.

## Who we are and what we do

BSI is seen as a trusted agent of change for organizations and corporations, helping establish trust between stakeholders in an ecosystem-driven world. Our neutrality, deep expertise, and ability to bring the right people together ensures that we can help embed frameworks, best practices and standards that create trust between consumers, companies, and governments fostering impact for a fair society and a sustainable world.

We are committed to driving positive change by establishing robust standards that promote transparency, integrity, and accountability while empowering organizations to proactively identify, assess, and mitigate risks associated with modern slavery. By promoting best practices and ethical business conduct, BSI strives to protect vulnerable individuals, enhance corporate responsibility, and contribute to a world where fairness, human dignity, and sustainability are integral to how business is conducted. Through our consultancy services, we work with clients to identify potential modern slavery risks within their supply chains.

Aligned with our commitment to the UN Sustainable Development Goals (SDGs), which call for the universal end to poverty, protection of the planet and improvement in the lives and prospects of everyone by 2030, we create a positive impact through collaboration with clients, supply chain partners, and stakeholders to drive sustainable choices and ethical business practices.

We will continue to pursue profit for purpose, balancing commercial interests with the goals of our Royal Charter, managing the dynamics between profit and societal and environmental impact, to promote trust in a digital and sustainable world.

## Our Colleagues

Our colleagues include permanent and fixed-term employees and people working on our behalf, including contractors and external resources.

## Our Supply Chains and Partnerships

As a professional service organization, we buy from a variety of suppliers who offer a wide range of goods and services, including technological hardware and software, consulting, facility renovation, catering, and cleaning. The majority of our spend in these categories is consolidated with larger suppliers, with which we have long-term relationships. Globally we purchase from 5,400 suppliers annually with a total annual spend of over £280M. We employ several approaches to assess, monitor and ultimately reduce the risk of modern slavery.

As part of our commitment to responsible business practices, we collaborate with innovation partners who share our values and ethical standards. In partnering with others, we ensure that modern slavery and broader human rights risks are considered throughout the innovation lifecycle. Our partnerships are carefully assessed to ensure alignment with our Code of Business Ethics and Anti-Slavery and Human Trafficking Policy, reinforcing a shared goal of transparency, integrity, and positive societal impact.





# Policies in relation to slavery and human trafficking

## Our Operations

Our policies flow from BSI's Code of Business Ethics which makes specific reference to modern slavery in order to reflect BSI's proactive approach.

The Code demonstrates BSI's commitment to identifying and mitigating modern slavery risks across our operations and supply chains. We achieve this by conducting comprehensive human rights due diligence on our business activities and relationships, continuously reviewing our purchasing practices, and actively collaborating with suppliers, partners, and peers to minimize risks. Additionally, we promote a culture of transparency by encouraging colleagues to voice concerns through our Speak Up mechanisms, ensuring ethical practices are upheld and the risk of exploitation is effectively addressed.

The Code has been communicated through communication and awareness activities led by BSI's Compliance & Ethics Team, including senior management bulletins and Chief Executive sponsorship to ensure that this is a 'tone from the top' message. All employees are required to complete annual mandatory training on the Code of Business Ethics which includes a declaration that they have read and understood the Code, which sets out expected behaviors.

Our Board-approved Anti-Slavery and Human Trafficking Policy reinforces our unwavering commitment to preventing modern slavery and ensuring ethical practices across our operations and supply chain. This policy enhances our existing frameworks by setting clear expectations for our people, suppliers, and partners, outlining robust due diligence measures, and strengthening our risk management approach. It highlights our zero-tolerance stance on forced labour, human trafficking, and exploitation, while also emphasizing the importance of transparency, accountability, and responsible sourcing. Through this policy, we are further integrating human rights considerations into our business practices, ensuring compliance with legal and regulatory requirements.

Through our Code of Business Ethics and Respect at Work Policy, we emphasize our dedication to equal opportunities, respect, dignity, and understanding, ensuring that all employees and stakeholders

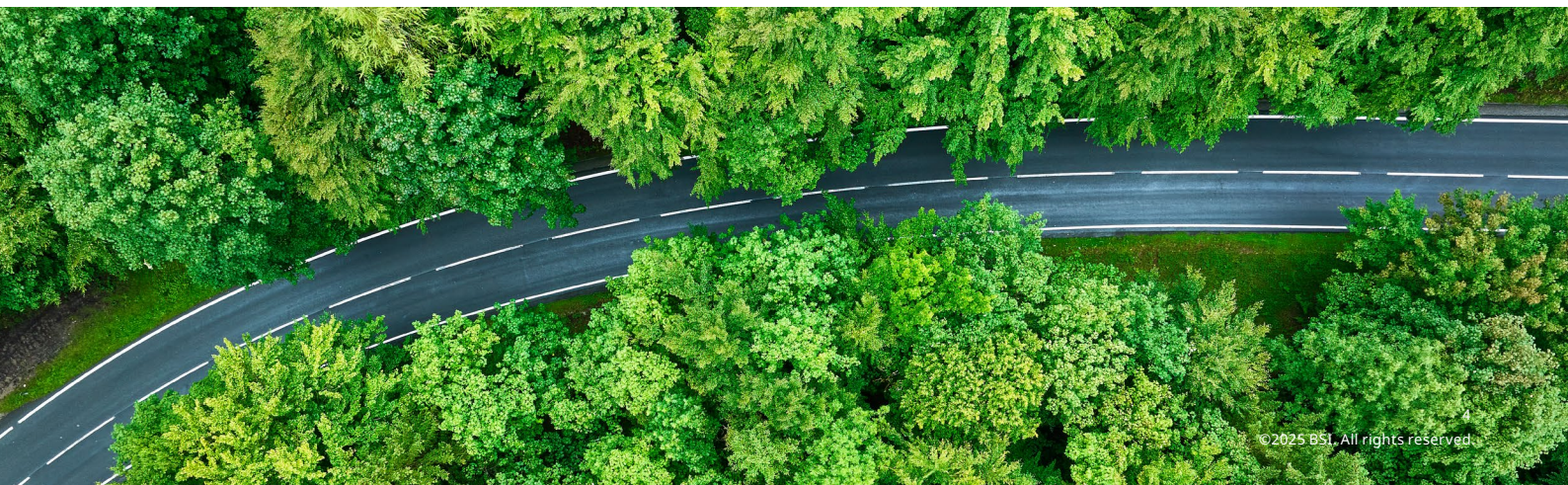
are treated fairly and without discrimination. This commitment extends to maintaining a work environment free from harassment, bullying, and any form of unfair treatment, while promoting diversity, equity, and inclusion.

Supporting the Code, we have policies on recruitment and selection, holiday and absence, sick pay, unpaid experience & placements, working conditions, disciplinary processes and speaking up. Terms of engagement ensure adherence to laws regulating working hours and overtime, ensuring no coercion to work beyond agreed limits. Each business area throughout our global operations has a dedicated People Team representative as well as a People Services Hub, that provide continuous support and guidance on all these policies.

We apply regular and effective governance to support consistency in pay budget setting and management across the group with appropriate levels of sign off based on cost and risk. This is overlayed by regular statutory and voluntary reporting and auditing to ensure compliance with the regulations that underpin fair pay and worker rights. Additional oversight is provided by BSI's Remuneration Committee and annual reviews to ensure alignment with local legislation, market standards and ethical practices.

We have a financial wellbeing strategy that supports – and is supported by – the organization's overall health and wellbeing strategy. This includes running financial education and benefit communication programmes to make employees aware of the options open to them and how to get the most from their decisions.

Our Global Recruitment Policy enables us to attract, recruit and select the most suitable candidates using efficient, fair, transparent, and effective methods. Upholding equal opportunities and our commitment to non-discriminatory hiring practices is paramount in our approach. All recruitment decisions focus on qualifications and abilities directly related to the role, strictly adhering with local legislation and regulations. Rigorous right-to-work and pre-employment background checks eliminate the possibility of child labour. Employees are onboarded with detailed terms of their engagement with BSI in the form of a written





contract of employment (or applicable documentation as aligned to local labour law) in local language.

The Global Health and Safety Team ensure that all BSI operating locations maintain certification to ISO 45001 (Health and Safety Management System), reflecting a commitment to high standards of occupational health and safety. Additionally, the Group Travel and Facilities Team conduct regular reviews of property and working conditions, ensuring they remain safe, compliant, and conducive to employee well-being whether within our own locations or travelling on behalf of BSI.

We are committed to ensuring the health, safety and wellbeing of our people. Our focus is on fostering an environment that nurtures both physical and mental health, empowering each colleague to perform optimally. Recognizing that a supported workforce yields higher performance, longer retention, and superior business outcomes, we endeavour to provide comprehensive support for health, wellbeing, and career development.

The risk related to freedom of association is effectively managed through adherence to local collective bargaining agreements and the implementation of anti-discrimination policies including BSI's Respect at Work Policy and Code of Business Ethics. While unions are not commonly present within our organization, we uphold a policy of non-interference, ensuring employees have the freedom to establish their own worker unions without obstruction. Additionally, we actively engage with workers' councils.

## Suppliers

Our Supplier Code of Conduct sets out the expectations that we have of our suppliers, including in relation to human rights and labour, and align with the International Labour Organisation (ILO) core conventions. When procuring goods and services, BSI places a high priority on environmental, health, safety and wellbeing, information security, diversity & inclusion, ethical and social issues.

Suppliers are expected to actively assess and mitigate the risk of modern slavery within their operations and supply chains. This includes ensuring that all workers are legally employed, not subjected to forced, involuntary, bonded, or exploitative labour, and have the freedom to terminate their employment without fear of penalty. Workers must not be charged recruitment fees or costs, nor required to surrender deposits, identity documents, or travel papers as a condition of employment. In the event that potential victims are identified, the Supplier Code of Conduct requires that suppliers prioritize their safety and wellbeing. We also expect suppliers to promptly notify BSI of and collaborate with us to remediate any instances of modern slavery effectively.

In 2024, we developed new purchasing guidance for our enhanced supplier due diligence process. BSI buyers are encouraged to prioritize sustainability and human rights considerations when selecting suppliers, ensuring that they meet minimum ethical and compliance standards. To support this, we have updated





our Procurement Policy, providing colleagues with clear guidance on assessing risks associated with onboarding new suppliers. The policy also directs them to specialist expertise within the business, enabling informed decision-making and reinforcing our commitment to responsible sourcing.

The Group Procurement team is responsible for monitoring the compliance activities of our supply chain partners, and the Group Internal Audit & Risk and Group Compliance & Ethics teams are responsible for reviewing and, where appropriate, investigating possible breaches of the Code of Business Ethics, and the Supplier Code of Conduct.





# Raising awareness and combating modern slavery & human trafficking

## Regular training

Throughout the organization, all colleagues are required to complete annual mandatory e-learning training, which covers topics such as modern slavery, BSI's Speak Up program, and other key ethical considerations. This training reinforces awareness of the policies in place and ensures that colleagues uphold the highest standards of integrity, safety, and ethical decision-making in their roles.

In 2024, there was a 97% completion rate for all training modules across our UK and international population and BSI's line managers and leadership make efforts to follow up with staff who have not completed training.

Throughout the year we continually promote our Code of Business Ethics and Speak Up program to our people, through our on-boarding process and internal communications and initiatives carried out by our Group Compliance & Ethics team.

Our Client Services team has received targeted training and guidance on recognising modern slavery risks, identifying potential indicators, and understanding how to report concerns through the appropriate channels. This training is aimed at building confidence and awareness among colleagues, particularly during client engagements, audits, and site visits where red flags may emerge.



BSI's Group Procurement and Consulting Service Division have worked together to enhance our management systems and supplier management procedures in alignment with BS 25700 standards on modern slavery. As part of this effort, in 2024, we delivered a comprehensive training session covering key topics such as BS 25700 compliance, modern slavery risks, supply chain risk management, ethical sourcing, and supplier due diligence. The session was attended by key stakeholders from Compliance, Facilities, Finance, Maintenance, Marketing (procurement-related), and Procurement, reinforcing our shared commitment to ethical business practices and responsible supply chain management. This initiative represents a significant step in strengthening our corporate social responsibility efforts, regulatory compliance, and commitment to combatting modern slavery across our operations.

# Raising concerns

An important mechanism for tracking our effectiveness is through grievance channels and there are a range of ways that people can raise concerns at BSI.

We operate a Grievance Policy and associated procedures and provide a confidential, free whistleblowing service to encourage internal and external stakeholders to “Speak Up”.

Our Speak Up helpline is available to any colleague or third party (including suppliers and contractors) who come across bad business conduct or unethical behaviour, including suspected instances of modern slavery. Stakeholders are made aware of the helpline through a number of channels including our website and awareness material in BSI premises. All reports are investigated by our Compliance & Ethics Team. This service is available in over 170 languages and enables anonymous reporting. Stakeholders are encouraged to make reports, when they see fit to do so, by clicking the link: [Speak Up helpline](#), further details are available on the BSI website.

Our Code of Business Ethics, Speak Up Policy and related policies clearly state that any form of reprisal or victimization against individuals who raise concerns will not be tolerated. This commitment is reinforced through mandatory annual training, ensuring all our people understand the reporting process and their rights to speak up without fear of retaliation.

When a concern is raised, it is assessed to determine the appropriate course of action. This may include reviewing the report, conducting an internal inquiry, or initiating a formal investigation. Upon completion of the process, feedback is provided to the individual who raised the concern, ensuring transparency and accountability.

In addition to the Speak Up helpline, colleagues can speak up through a variety of mechanisms including:

- Informal conversations with line managers
- Employee Assistance Programme
- Providing feedback through our annual engagement survey exercise
- Talking to People representatives
- Raising an issue with a senior leader
- Raising a formal grievance
- Talking to the Compliance & Ethics Team

Internally we have a group of employee networks which provides other avenues for people to raise labour rights concerns, these include The Women’s Network, LGBTQ+ & Allies Network, and Black Alliance & Networking Group.

We expect suppliers to notify BSI and work together to remediate any incidents of modern slavery, as set out in our Supplier Code of Conduct.





# Due diligence processes in relation to modern slavery and human trafficking in our business and supply chains

## Approach to risk management

Across BSI, business Divisions own the management of their risks and are responsible for:

- Identifying and reporting local risks
- Maintaining risk registers and business continuity plans where appropriate
- Implementing mitigating actions and controls

Business Divisions are supported by Group Functions, which include Internal Audit and Risk, Legal, Finance, IT, Compliance & Ethics, Health and Safety, Procurement and People. Identified risks are assessed and reported in line with BSI's Risk Management framework.

In 2025, BSI is enhancing its governance approach to modern slavery through the establishment of a dedicated Human Rights and Modern Slavery Working

Group. Chaired by the Head of Compliance & Ethics, the group will include senior representatives from across Group Functions and Divisions and will convene quarterly. Its key responsibilities include driving the implementation of risk mitigations and reporting progress to BSI's Group Sustainability Committee. Insights and outcomes from this group will directly inform our ongoing group-wide modern slavery risk assessment, helping to identify emerging risks, evaluate existing controls, and address any opportunities to strengthen our overall response.





# Due diligence on our own workforce

We conduct thorough recruitment processes for all roles, hiring directly wherever possible, and we are confident that none of our direct employees are experiencing conditions of modern slavery.

We offer multiple channels for individuals to raise concerns, providing an essential mechanism for early identification of potential issues. While we do not see modern slavery as a risk in our own workforce, we recognise that it is at one end of a spectrum of labour practices with decent work at the other. Our focus is to promote fair and ethical working conditions, and proactively address any labour-related concerns that fall short of this standard.

In 2024, we strengthened our leavers process to better understand the reasons for people leaving BSI and to address common themes related to working practices and conditions.

## Supplier due diligence

Our centralised Procurement function supports all BSI operations and maintains a list of pre-approved suppliers. Our policy is for Procurement to get involved for all new supplier engagements with a value over £100,000 or where risk is considered high (determined by an initial self-serve risk assessment tool) to ensure appropriate prequalification questions are answered and evaluated. Questions cover a broad range of risk domains, including modern slavery.

Due diligence is carried out on our suppliers at the commencement of an engagement and periodically thereafter, to make sure that we have the right contractual provisions and procedures in place, and ensure that our suppliers are aware of the standards we expect of them.

BSI's standard terms and conditions with suppliers require them to:

- comply with all relevant laws, including modern slavery legislation;
- warrant that they have suitable practices and procedures in place to ensure that human trafficking, exploitation and modern slavery does not take place in their organizations or their supply chains;
- notify BSI if they become aware of any violations; and
- allow BSI to monitor them to ensure that they are complying with modern slavery laws.

When issues are identified, BSI reserves the right to terminate engagements as outlined in our standard contractual terms. In cases where violations of internationally recognized human rights occur, we work with relevant parties to enable affected individuals to

access to remedy, compensation, and justice. We do recognize that immediate termination may, in some instances, increase risks for already vulnerable workers. Where appropriate, we therefore use our judgement to prioritize working with suppliers to implement compliant and ethical practices, using termination only as a last resort.

## Risk assessment

As part of our initiative to identify and mitigate the risk of modern slavery and human trafficking in our supply chain, BSI periodically assesses the risk associated with our suppliers and implements control measures appropriate to the identified risk level. The following risk factors have been identified in our supply chain:

- Country of operations;
- Type of industry;
- Relationship with our supplier;
- Workforce structure; and
- Supply chain of our supplier.

The following industries ('Higher Risk' industries), in which some of our suppliers operate, are at an increased risk of modern slavery:

- Electronics and technology;
- Cafeteria Services / Catering Agencies;
- Construction / Refurbishment Management;
- Engineering;
- Facilities Management;
- Furniture;
- Meetings & Events; and
- Marketing Promotional Items.

In line with the commitments made by BSI, existing and new suppliers who provide us with goods or services are required to be assessed and confirm compliance with BSI's Supplier Code of Conduct.



# Business and supply chains

**Parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk.**

In 2024, BSI focused on three priority areas in which to build an understanding of potential slavery and human trafficking risks:

## Our Operations

Procurement has been identified as a critical focus area for modern slavery due diligence. In line with this, targeted training has been developed and delivered to employees involved in procurement activities across the UK, UAE and Turkey. This training has been designed to enhance awareness and capability in identifying modern slavery risks, particularly in relation to the updated Procure-to-Pay (P2P) process. Key components included an overview of the BS 25700 principles, identification of potential indicators of modern slavery and human trafficking, and a detailed explanation of revised supply chain risk management procedures.

The updated P2P process also plays an integral role in driving internal awareness. By standardising procurement practices globally, including the integration of ethical sourcing requirements and defined due diligence protocols, we are embedding responsible and transparent procurement practices into day-to-day operations.

These efforts are part of BSI's broader commitment to maintaining a supply chain that is free from modern slavery. Ongoing support and guidance are provided to strengthen supplier oversight and uphold the highest ethical standards.

## Client Services

Throughout 2024, we took significant steps to integrate human rights considerations into our client risk and acceptance procedures, ensuring that modern slavery risks are systematically assessed as part of our engagement process. Our approach involved close collaboration with risk management teams to enhance awareness of the potential risks posed by modern slavery, forced labour, and exploitative practices, as well as the broader ethical and legal implications for our business and clients.

To strengthen our efforts, we developed and distributed detailed guidance to our client-facing teams, equipping them with the knowledge and tools needed to identify red flags and assess risks across various industries. This guidance outlines sector-specific vulnerabilities, indicators of modern slavery, and best practices for due diligence and risk mitigation. Additionally, we implemented training initiatives and awareness

campaigns to reinforce the importance of ethical decision-making and proactive risk identification.

## Supply Chain

BSI has strengthened its approach to assessing and managing modern slavery risks by integrating advanced tools, policies, and sustainability principles into our procurement framework. We leverage third-party solutions such as Credit Safe to assess supplier financial stability and World Check to screen for sanctions, legal prosecutions, and reputational risks, helping us ensure that we collaborate only with reputable and compliant partners. Our Group Procurement Policy and Procedures have been updated to incorporate Sustainable Procurement requirements, and we have rolled out procurement related controls and monitoring that adhere to BS 25700 guidelines. These initiatives help embed sustainability and ethical sourcing into every stage of our procurement process, ensuring that responsible business practices guide our decision-making.

To strengthen risk assessment, we use BSI Connect Screen, a data-driven tool that helps identify modern slavery risks like forced labor, child labor, human trafficking, and forced marriage. It analyses global data to assign risk ratings to suppliers and countries, allowing us to focus on high-risk areas. Through this tool, we conduct online assessments, monitor risk trends, and improve our strategies to reduce modern slavery risks in our supply chain. Our approach follows internationally recognised standards, including ISO 20400:2017 (Sustainable Procurement) and ISO 25700:2022 (Modern Slavery Response), reinforcing our commitment to ethical sourcing.

Through our Due Diligence Assessment (DDA) process, we actively communicate BSI's Supplier Code of Conduct, setting clear expectations for ethical business practices. We also conduct enhanced due diligence for new high-risk suppliers and periodic reviews for existing ones where necessary.

By continuously refining our policies and processes, we're strengthening ethical sourcing and reducing modern slavery risks across our global supply chain.



# Reviewing the past year

In our previous statement BSI committed to report on the following:

Action	Performance 2024
Training completion rate	Awareness training: Over 97% of our people have completed mandatory training on modern slavery and confirmed their compliance with the Code of Business Ethics.
Incidents Raised, Investigations and Remedial Action	There were no reports of potential modern slavery within our own business and supply chain in 2024.
Supplier Compliance Rate	Approximately 77% of suppliers in our supply chain have confirmed acceptance of our anti-slavery policies and standards.

## Looking to the future

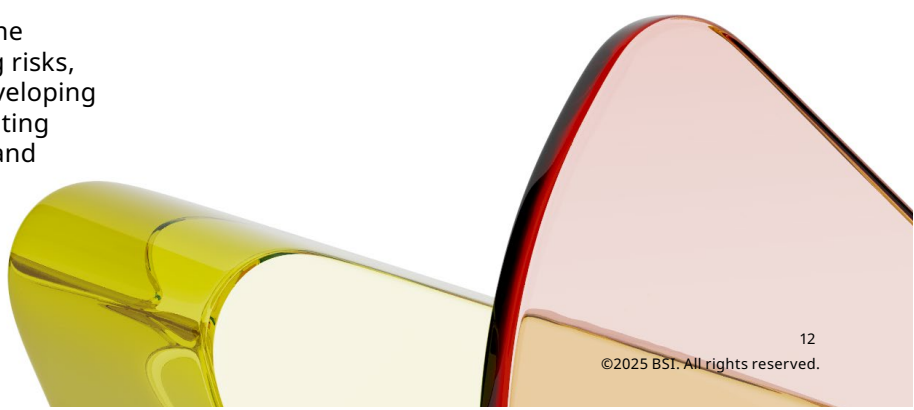
Our key aims for 2025 are as follows:

- In alignment with International Human Rights Day on 10th December 2025, BSI will launch a comprehensive mandatory e-learning module focused on modern slavery and human rights. This module will educate employees on identifying risks, understanding key international frameworks (such as the UN Guiding Principles on Business and Human Rights), and applying BSI's policies in their roles.
- The Supplier Code of Conduct will continue to be embedded across BSI's global supplier base, ensuring all suppliers acknowledge and adhere to our human rights and modern slavery expectations.
- Employees in high-risk roles, such as those in procurement, service delivery, and supply management, will receive specialized training tailored to their responsibilities. This training will include case studies, real-world scenarios, and guidance on escalation procedures to enhance their ability to detect and mitigate modern slavery risks effectively.
- A structured escalation framework will be introduced to support colleagues working in social compliance services, ensuring they have clear protocols for addressing human rights concerns. This framework will outline reporting channels, risk assessment criteria, and intervention strategies when potential violations are identified.
- In anticipation of ISO 37200 (Managing the risk of Modern Slavery guidance) being released in 2026, BSI will establish a structured management system framework to monitor and mitigate risks systematically.
- The Modern Slavery Working Group will convene quarterly to review progress, discuss emerging risks, and refine strategies. A key focus will be on developing measurable KPIs to track BSI's impact in mitigating modern slavery risks, ensuring accountability and continuous improvement.

- As part of our due diligence efforts, BSI will conduct targeted audits of key suppliers to assess compliance with our modern slavery and human rights standards. These audits will evaluate working conditions, recruitment practices, and adherence to our Supplier Code of Conduct, with corrective action plans implemented where necessary.
- We plan to leverage a third-party ESG data provider to assess supplier performance and identify modern slavery risks, thereby enhancing our due diligence processes and ethical sourcing efforts.

To assess the effectiveness of the measures taken in 2025, we will continue to report on:

1. Training completion rate: calculate the percentage of our people who have completed modern slavery awareness training and declared compliance with the Code of Business Ethics.
2. Supplier compliance rate: calculate the percentage of suppliers in our supply chain that have confirmed compliance with our Supplier Code of Conduct.
3. Incidents raised, investigations and remediation: keep a record of the number of modern slavery incidents reported within the organization, supply chain and services and the time taken to investigate and remediate any reported cases. Analyze and monitor the effectiveness of any remediation activities implemented in response to reported cases.





# Closing Commitment Statement

At BSI, we firmly denounce modern slavery and are dedicated to its eradication. We pledge to take concrete action to ensure our operations and supply chain remain free from any form of forced labour or human trafficking.

We pledge to:

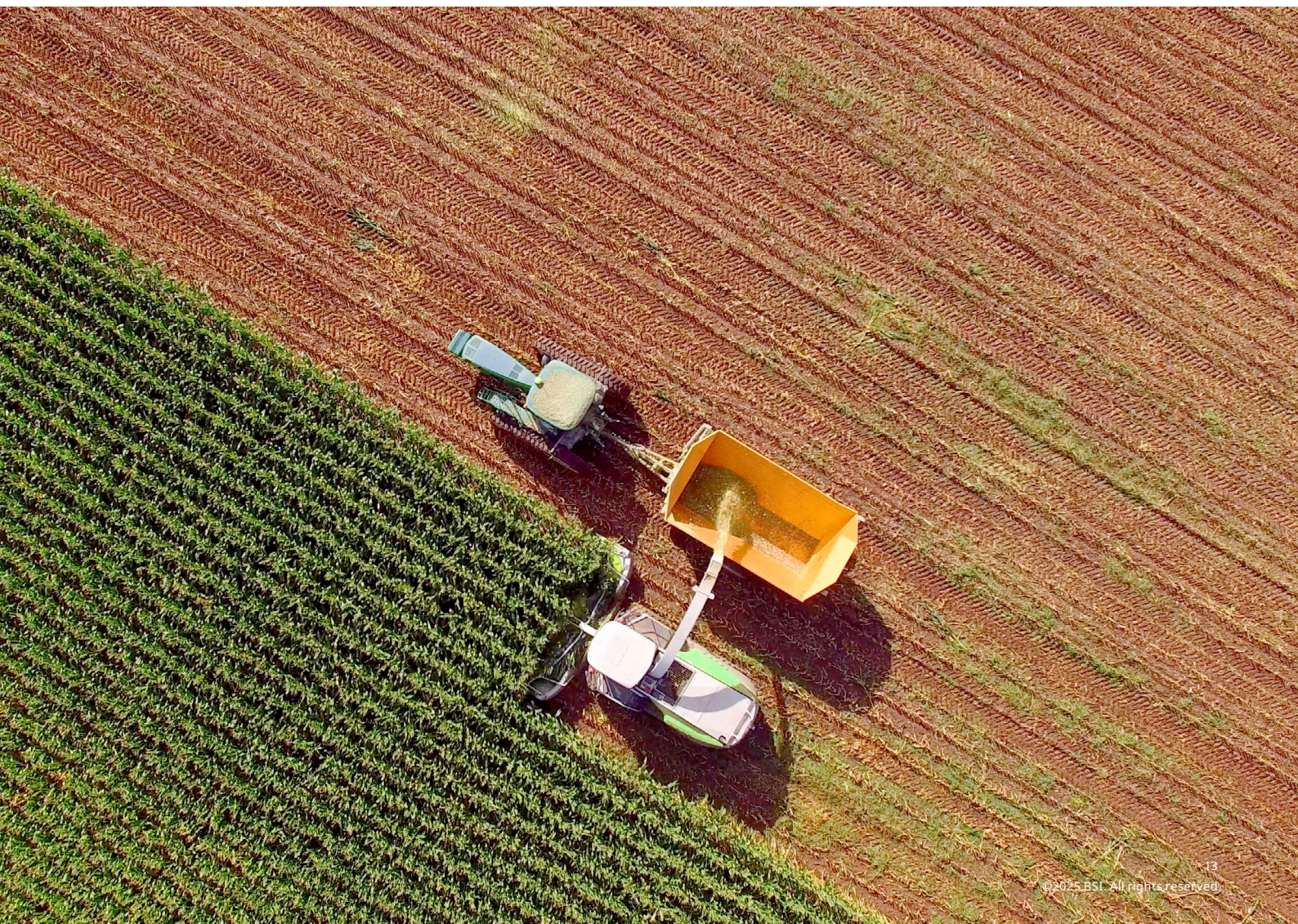
1. Conduct regular audits: We will conduct thorough audits of high-risk suppliers within our supply chain to identify and address any risks of modern slavery.
2. Implement strict policies: We will establish and enforce robust policies against modern slavery, making it clear in our organization.
3. Educate our people and partners: We will provide training and awareness programs to our people and guidance to suppliers to recognize and report any signs of modern slavery.
4. Collaborate with stakeholders: We will work with government agencies, and industry partners to share best practices and enhance our collective efforts.

We understand the importance of this issue, and our resolve to combat modern slavery remains resolute. Together, we can contribute to a world free from exploitation and oppression.

This statement has been approved by the BSI Group Board.

---

**Susan Taylor Martin, Chief Executive, BSI**  
**Date:**





# Case Study:

## Supplier Engagement

### – Addressing Recruitment Fees

Recruitment fees are fees or costs that workers pay in order to secure employment or placement at a workplace. These fees can range from payments to recruitment agencies or recruiters, medical tests, or even wage deductions. Significant recruitment fees, as can be common with sites that hire a large number of foreign migrant workers, can be seen as an indication of forced labor, as paying such fees can leave workers in a situation similar to debt bondage, which is a form of forced labor.

BSI Consulting has worked with clients that have raised concerns with their suppliers charging exorbitant recruitment fees to foreign migrant workers, against the client's expectations and supplier requirements. These suppliers often lack the necessary management systems necessary to adopt responsible recruitment practices that would address forced labor risks. To tackle this issue, BSI Consulting has developed and scaled a supplier engagement and skills development program tailored to the specific contexts and concerns of the client's supplier base.

BSI Consulting's supplier engagement program features live, remote trainings and workshops that upskill both the client and supplier on the foundations of ethical recruitment practices, as well as global regulations and local labor law requirements. The program features real world case studies, exercises, and a four-month implementation plan during which BSI supports the supplier in creating and implementing an action plan to address its issues around recruitment fees.

The supplier engagement program has been adapted to clients in different industries, and the results have been widespread: there is typically increased engagement from suppliers, in that they are more willing to work with BSI and the client on addressing their concerns on recruitment fees, and the client is able to further identify key risk areas to prioritize future resources.

