



Loop Anti-Slavery Policy

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Purpose of this Policy

At Loop, we are committed to ensuring that all our team members, partners, and suppliers understand the nature and extent of modern slavery. This policy aims to raise awareness among everyone involved with Loop about recognizing the signs of modern slavery and empowers them to confidently report any suspicions through the appropriate channels, helping us uphold our shared ethical responsibilities.

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Definition of Modern Slavery

We define modern slavery as the exploitation of an individual by others for personal or commercial gain. This exploitation may involve deception, coercion, threats, force, or abuse of power, resulting in the loss of personal freedom. Modern slavery includes, but is not limited to, human trafficking, forced labour, and debt bondage.

Understanding Modern Slavery: Scope, Cause and Impact

Scope and forms of modern slavery

Modern slavery is a global issue affecting millions of people across all regions. Victims may be found in both developing and developed countries, often hidden in complex supply chains or informal work settings.

Modern slavery has been found in many industries, including garment manufacturing, mining, and agriculture, and in many contexts, from private homes to settlements for internally displaced people and refugees. Modern slavery impacts on all of us, from the food we consume to the goods we purchase. Many products on our local shop shelves might have been made by people in forced labour, but the complex [supply chains](#) that businesses have created might make it harder for business to spot exploitation and abuses in their supply chains. In many cases they even hide behind this complexity to evade responsibility.

According to the latest [Global Estimates of Modern Slavery \(2022\)](#) from Walk Free, the International Labour Organization and the International Organization for Migration:

- 49.6 million people live in modern slavery – in forced labour and forced marriage
- Roughly a quarter of all victims of modern slavery are children
- 22 million people are in forced marriages. Two out of five of these people were children
- Of the 27.6 million people trapped in forced labour, 17.3 million are in forced labour exploitation in the private economy, 6.3 million are in commercial sexual exploitation, and nearly 4 million are in forced labour imposed by state authorities
- The Covid-19 pandemic has exacerbated the conditions that lead to modern slavery
- Migrant workers are particularly vulnerable to forced labour.

Modern slavery takes many forms. Some traditional forms of slavery continue to exist in their original forms today, while others have evolved into new and different manifestations. The most common are:

- [Human trafficking](#). The use of force, threats, deception or coercion to recruit, transport, transfer, harbour or receive people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.
- [Forced labour](#). Any work or service people are forced to do against their will, usually under threat of punishment.
- [Debt bondage/bonded labour](#): People forced to work to pay off a debt, loan or of money given in advance, while losing control over their working conditions and the terms of the debt.
- [Descent-based slavery](#): describes a situation where people are born into slavery. A very old form of slavery, where people are treated as property and their “slave” status has been passed down the maternal line.
- [Child slavery](#): When a child is exploited for someone else’s gain. This can include various forms such as child trafficking, forced child labour, child associated with armed forces and groups, forced child marriage, and child domestic servitude.
- [Forced and early marriage](#): forced marriage occurs when a person has been married without having given their full and free consent. Forced marriage is considered to encompass child and early marriage, any marriage or union where at least one party is under the age of 18, given that one or both parties have not expressed full, free and informed consent.
- [Domestic servitude](#): Domestic work and domestic servitude are not always slavery, and when properly regulated, can be an important source of income for many people. However, when someone is working in another person’s home, they may be particularly vulnerable to abuses, exploitation, forced labour and slavery, as they might be hidden from sight and lack legal protection.

Causes

People may end up trapped in slavery because they are vulnerable to being tricked, trapped and exploited, often as a result of poverty and exclusion and because laws do not properly protect them. Modern forms of slavery are fuelled by intersecting forms of oppression and inequalities. They often result from intersecting factors, such as race, ethnicity, caste, social and economic status, age, disability, nationality, sexual orientation, gender identity and migration status.

People can be particularly vulnerable to modern slavery when external circumstances push them into taking risky decisions in search of opportunities to provide for their families, or when people find they are simply pushed into jobs in exploitative conditions. Anyone could be pressed into forced labour, but people in vulnerable situations such as after a humanitarian disaster or being in debt are most at risk. Where do we find slavery?

Impact

Modern slavery severely undermines human rights, dignity, and social justice, leaving survivors with physical and psychological trauma, economic deprivation, and social marginalization. Survivors of modern slavery might face violence or threats, be forced into inescapable debt or have their passports taken away or be threatened with deportation.

Survivors often experience challenges in accessing law enforcement or justice due to fear of retaliation, lack of trust in authorities, language barriers, stigma, discrimination, limited knowledge of their rights, or the absence of accessible and survivor-centred reporting mechanisms.

Our Commitment

We believe in securing freedom for everyone, everywhere, always.

Our commitment starts with protecting and respecting human rights and taking action to prevent slavery and human trafficking in all their forms. We are committed to act ethically and with integrity in all our relationships and use all reasonable endeavours to take action within our direct operations and wider sphere of influence to ensure that slavery and human trafficking are not taking place.

We recognise there are risks of modern slavery in the supply chains for all types of goods and services, often hidden within seemingly legitimate industries. By its very nature, modern slavery is difficult to detect but we remain vigilant.

We are committed to upholding the principles of the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Our Actions

- We will not use or tolerate the use of forced labour or human trafficking in our operations or supply chains.
- We only engage with suppliers who share our commitment to preventing slavery and human trafficking, and who comply with all relevant laws and regulations.

- We conduct regular assessments of our supply chains to identify and address any potential risks of slavery and human trafficking.
- We conduct comprehensive background checks during our hiring process. This ensures that candidates do not have employment histories involving conflicts of interest or violations of Loop's Codes of Conduct or other organisational policies.
- We inform all employees about our firm commitment to combating trafficking-related activities. Employees are made fully aware of the actions prohibited under this policy, including any involvement in modern slavery practices.
- We support the right to organise, including freedom of association and representation of workers.
- We expect all employees, suppliers, and partners to uphold these commitments and to report direct knowledge and reasonable suspicion of conduct that breaches or is inconsistent with this policy through the appropriate channels, including Talk to Loop is appropriate.

Partnerships and Supplier Commitments

Our commitment to eradicating modern slavery and human trafficking extends to requiring the same dedication from our partners and suppliers. We continue to work closely with them to ensure that modern slavery is not present in their operations or programming.

We expect all team members, partners, and suppliers to sign and adhere to our [Codes of Conduct](#), which specifically reference our Anti-Slavery Policy. This policy is embedded as a mandatory requirement in our standard partnership agreement, which also includes clauses confirming awareness of and commitment to preventing modern slavery.

Reporting Concerns and Suspensions

For any suspicions related to Loop, its partners or suppliers, please report directly to one of the following channel:

- Sending an email to the Loop Lead - alex@talktoloop.org
- Filling a [complaint form](#) via our website (anonymously if you wish)

For reports related to modern slavery concerns involving other organizations, entities, or for support to survivors, we welcome and encourage submissions via our feedback platform, where these will be treated as sensitive feedback and managed appropriately in

line with our safeguarding procedures: referring the concern to an appropriate service that can help, and, where possible, following up to ensure that the service can assist.

- Reporting the concern via our [feedback platform](#) (anonymously if you wish)
- Reporting the concern to an Anti-Modern Slavery charity, for example [Unseen](#)

Our Response to Violations

We commit to taking prompt and effective action to investigate and address any incidents or allegations of slavery or human trafficking within our operations or supply chains. Upon identifying a suspected violation, we will conduct thorough investigations to gather all relevant information and assess the severity and circumstances surrounding the alleged breach.

Depending on the nature and extent of the violation, appropriate remedial actions will be taken, which may include, but are not limited to:

- Conducting additional training and awareness on slavery and human trafficking prevention.
- Enhancing our monitoring and auditing procedures for compliance.
- Engaging in constructive dialogue and cooperation with the concerned party to rectify the situation.
- Implementing corrective action plans, with measurable targets and timelines, to prevent further violations.
- Reviewing and strengthening our supply chain vetting processes and risk assessment mechanisms.
- Collaborating with external experts, organisations, or authorities to obtain guidance and support.

In the event of a suspected violation of this policy, we aim to exhaust all possible remedial actions before considering termination of employment or termination of the supplier relationship. Termination will only be considered as a last resort, and we are committed to exploring alternative measures to address and rectify any identified issues.

We believe that a comprehensive and proactive approach, rooted in education, collaboration, and remediation, is vital in combating modern slavery and human trafficking. However, we reiterate that in cases where these measures prove ineffective or if there is a deliberate and willful disregard for this policy, responsible disengagement may be deemed necessary as a means of upholding our commitment to eradicating these practices.

Continuous Improvement

We recognise that eradicating slavery and human trafficking is a complex and evolving process. We will continue to review and improve our policies and practices to ensure that

we are doing everything we can to prevent slavery and human trafficking in our operations and supply chains.

Appendix 1 - Additional Learning Resources

This section contains some additional resources for team members and partners to learn more about modern slavery, where we can find it and how it still exists today.

Video Resources

Title of Video	Length in Minutes
What is Modern Slavery?	16:27
What is Modern Slavery?	10:31
The most affected countries	07:05
Modern Day Slavery – Supply Chains	02:33
Tackling Modern Slavery (UK/Europe Context)	08:49
Individual Experience of Labour Trafficking (In the US)	10:49
Slavery - A Global Investigation	1 hour 17mins

Additional Resources

<http://www.endslaverynow.org/learn/books-films>

Appendix 2: Supply Chain Risk Assessment Factors

When considering using a new supplier or partner, we should consider the risk of modern slavery within the supply chain. This is a list of things to consider when assessing the risk of a certain supplier or partner:

- **Country/Region Analysis:** Assess the countries or regions where your suppliers operate or source materials from. Consider the prevalence of modern slavery in those areas, as well as any legal frameworks, labour conditions, and social indicators that may indicate a higher risk.
- **Supplier Evaluation:** Evaluate your suppliers based on various criteria, such as size, industry, location, and subcontracting practices. Consider factors such as their labour practices, worker welfare initiatives, compliance with applicable labour laws, and certifications or accreditations they hold.
- **Supply Chain Complexity:** Analyse the complexity and length of your supply chain. Identify the number of tiers, subcontractors, and intermediaries involved. The longer and more convoluted the supply chain, the higher the risk of modern slavery practices going undetected.
- **High-Risk Industries:** Identify industries that are traditionally associated with higher risks of modern slavery, such as agriculture, construction, textiles, manufacturing, and electronics. Focus your assessment on suppliers operating within these industries.
- **Human Rights Due Diligence:** Evaluate the extent to which your suppliers have implemented human rights due diligence processes. Assess their commitment to upholding international labour standards, conducting risk assessments, and implementing policies to prevent and address modern slavery.
- **Past Violations and Incidents:** Consider any historical incidents or violations of labour laws or human rights by your suppliers. Assess the severity, frequency, and actions taken to rectify those incidents. This can help identify patterns and potential risks.
- **Employee Engagement and Grievance Mechanisms:** Evaluate the effectiveness of your suppliers' mechanisms for worker engagement, such as labour unions, worker committees, or grievance mechanisms. Assess whether employees have the means to voice concerns or report potential violations without fear of retaliation.
- **Subcontractor Management:** Examine how suppliers manage subcontractors and their due diligence practices in the subcontracting process. Ensure that suppliers

have appropriate mechanisms in place to assess and monitor the labour practices of their subcontractors.

- **Audits and Certifications:** Consider the frequency and rigour of audits conducted by your suppliers, as well as any certifications they hold related to labour and human rights standards. Evaluate the transparency and credibility of these auditing processes.
- **Collaboration and Transparency:** Assess the willingness of your suppliers to collaborate and provide transparent information regarding their supply chain, labour practices, and efforts to combat modern slavery. Evaluate their commitment to ongoing improvement and their responsiveness to requests for information.