



**IT'S A PENALTY**

# Modern Slavery Consultancy Services

## Beyond Compliance

From supply chain training to survivor-centred policies,  
we support ethical action at every level.



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## The Issue: Modern Slavery

Modern slavery is the exploitation of people through force, fraud, or coercion for financial gain. It is the world's fastest-growing and second-largest criminal industry, affecting every country, as a place of origin, transit, or destination for victims. Modern slavery knows no boundaries. It crosses ethnic, cultural, and religious lines, and anyone - regardless of background - can be targeted.

**Modern slavery today is not merely an isolated abuse; it is a vast, global network of organised crime.**



## Leading Responsibly on Modern Slavery

**At It's a Penalty, we help businesses move beyond compliance to take meaningful action on modern slavery.**

Through strategic consultancy and tailored training, we support organisations to embed ethical, practical approaches across their operations. Since 2014, we've partnered with global brands, especially in travel and hospitality, to deliver impactful prevention and education campaigns.

Addressing modern slavery is not just a legal requirement, it's central to responsible business. As ESG expectations rise, companies must show ethical leadership and real-world impact across supply chains and governance.



### Why This Work Matters Now

Regulatory and societal expectations around human rights, labour practices, and supply chain due diligence are rising rapidly.

Businesses need practical tools and expert guidance to navigate this evolving landscape.

### Recent developments include:

- **EU Corporate Sustainability Due Diligence Directive (CSDDD)** – Mandating companies to identify and address human rights and environmental impacts across their supply chains.
- **EU Forced Labour Regulation** – Prohibiting products made with forced labour from entering EU markets.
- **UK Government's 2025 Trade Strategy** – Establishing an Office for Responsible Business Conduct with a clear focus on labour rights and ethical trade.

## Our Services:

We provide flexible, end-to-end support across sectors. Whether you're working with aviation, infrastructure, financial services or government, our approach can be tailored to fit both the sector and the scale of engagement.

### Broader Consultancy & Strategic Support

Our consultancy services are designed to complement training with practical, strategic action.



- **Modern Slavery Statement** drafting, review and gap analysis
- **Policy development** for employees, suppliers, subcontractors and partners
  - Focused on forced labour, slavery, trafficking and broader human rights risks
- **Facilitation sessions** with directors and senior leaders to:
  - Develop a modern slavery and human rights strategy
  - Align this strategy with broader business objectives
- **Remediation frameworks** and worker voice mechanisms
- **Supply chain risk assessments** and prioritisation strategies
- **Compliance roadmaps** to align with current and emerging legislation
- **Support** to embed strategy organisation-wide, ensuring practical implementation at every level.

### Modern Slavery Training & Capacity Building

We offer a comprehensive suite of training and capacity-building services to equip your clients with the knowledge and tools to respond effectively to modern slavery risks.



#### Our approach includes:

- Training needs analysis to identify gaps across roles and departments
- Tailored onboarding content and staff training, including videos and e-learning
- All materials can be delivered in person, online or via your LMS
- Executive briefings for senior leaders on:
  - Key legislation (e.g. UK Modern Slavery Act, CSDDD)
  - Supply chain transparency requirements
  - Global due diligence expectations

#### Delivery options:

- Short, targeted sessions or longer capability-building programmes
- Bespoke content adapted to your clients' sector and maturity level
- Interactive formats using:
  - Sector specific case studies
  - Scenario-based discussions
  - Practical toolkits and takeaways

## Case Study

It's a Penalty has partnered with Emirates to launch bespoke training courses specifically for HR and Procurement teams.

These 30-minute interactive sessions use case studies and scenario-based exercises to help corporate functions identify and manage hidden modern slavery risks in supply chains. This training educates HR and Procurement teams with knowledge and practical tools to address modern slavery risks and be compliant with current and upcoming due diligence legislation.



### Modern Slavery Improvements in Supplier Code of Conduct

Following our training, the Emirates Group strengthened its Supplier Code of Conduct to address modern slavery risks more effectively.

Old Supplier Code	Post-Training Enhancements
Broad prohibition on forced or involuntary labour, mentions supplier responsibility downstream.	Detailed forced labour/modern slavery rules: no document retention, no recruitment fees, workers free to leave, prompt payment of wages.
No explicit requirement for human rights due diligence.	Suppliers must conduct human rights due diligence: identify, prevent, mitigate, and report human rights impacts in supply chains.
Wages and contracts not clearly defined; focus mainly on anti-discrimination.	Clear fair wage standards, overtime payment, and written contracts aligned with local and international standards.
Child labour prohibited; aligns with ILO minimum age.	Strengthened global child labour compliance: higher standard of either local or international minimum age wherever applicable.
Harassment, discrimination, and safety addressed separately.	Labour & human rights integrated: modern slavery protections embedded, aligned with UN and ILO frameworks.
Whistleblower and enforcement provisions basic.	Strengthened whistleblower protections, audit rights, and corrective actions for non-compliance.

**These updates transformed the supplier code from broad principles to actionable, process-driven commitments.**



# IT'S A PENALTY


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Working to end abuse, exploitation  
and human trafficking globally.

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