‘Modern slavery as a governance risk’

2023 Phil Spathis Governance Address – Australian Council of Superannuation Investors

Remarks of Dr James Cockayne, NSW Anti-slavery Commissioner for delivery on 16 October 2023 in Naarm/Melbourne, Victoria

As prepared

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1. Good afternoon. I am honoured to have been invited to address you today.

Surviving slavery

2. Phil Spathis was a noted advocate for the rights of minority shareholders.
3. Over the weekend, the Australian people decided not to amend our Commonwealth Constitution, in the way proposed, to protect the rights of what we might call this country’s minority indigenous shareholders.
4. So I feel a special obligation to acknowledge that today I address you on the unceded land of the Wurundjeri Woi-wurrung peoples. I want to recognise and pay my respects to elders, past and present, and extend that respect to all Aboriginal and Torres Strait Islander people with us today.
5. The First Nations peoples of this country are the greatest survivors this world has known. Their culture has survived 65,000 years. They have survived invasion, genocide and dispossession. And they have survived practices that today we would call modern slavery.
6. The truth is, there is a lot of capital in this country that has its roots in coerced indigenous and other forced labour.
7. Take the Australian Agricultural Company, founded 199 years ago and still listed on the ASX today.[1] In its early decades Australian Agricultural relied heavily on Aboriginal workers that had been forced to work through dispossession, dislocation and violence.
8. Or take another ASX-listed company, CSR. Its early sugar holdings were built on the backs of trafficked South Pacific islanders. Between 1863 and 1904, over 62,000 people were trafficked to northern NSW and southern Queensland, according to the Australian Human Rights Commission.[2] Some of the resulting wealth flowed through the Fairfax family to build some of our storied press and cultural institutions, notably *The Sydney Morning Herald* and *The Age*.[3]

9. Survivors of indigenous forced labour still live amongst us. In May, ahead of Sorry Day, I travelled to the site of the Kinchela Aboriginal Boys Training Home and met with Uncle Widdy, Uncle Roger and Uncle Richard, the creator of the magnificent painting you see on this slide.[4]
10. Sixty years ago, those Uncles, members of the Stolen Generation, were victims of practices that would qualify today as modern slavery. They were farmed out to local homesteads for forced child labour and, sadly, physically, mentally and sexually abused.
11. The impact on their lives was terrible, and lives on in their minds, their bodies, their families. But they have survived, as have other members of the Stolen Generations who suffered similar crimes.
12. Survival should not be the sum total of any Australian's life expectations. Yet we must respect what it takes to survive. We must respect those who have fought, from Pemulwuy and the early resistance warriors, to Vincent Lingiari and the 200 Gurindji Wave Hill strikers, to today's generation of warriors for voice, justice and rights.
13. I pay my respects today to all First Nations peoples in this country, and any amongst us here today.

Hiding in plain sight

14. Nothing that happened this weekend changed the human rights of anyone in Australia. Today, just as last Friday, businesses in this country still have a responsibility to respect human rights. That includes a responsibility to respect people's right under Article 4 of the Universal Declaration of Human Rights to be free from slavery.[5]
15. Collectively, we are failing to realise that human right. Today, according to the best available survey-based estimates, there are 50 million people in modern slavery worldwide. 28 million in the business context. And 41,000 people in modern slavery in Australia, right now.[6]
16. 41,000 people being treated as if they are owned, in violation of criminal law. Deceptively recruited into debt bondage in Australian horticulture. Held in sexual servitude in the commercial sex industry. People living with disability who have been trapped into domestic servitude. Children sexually exploited online. And people in forced labour in our cleaning and security sectors.
17. In the year since I took up the post as the first independent Anti-slavery Commissioner in Australia, I have met over and over again with people who have experienced these things here.
18. Slavery has wrought havoc in their lives, leaving them with mental and physical injuries and disease, post-traumatic stress disorder, feelings of inadequacy and dependence, destroyed wealth and earning capacity, sometimes also a ruined credit history. Survivors are frequently desperate for housing, healthcare, and other forms of help.
19. Listening to survivors is central to my work. It's only by listening to those most affected that we will understand the source of exploitation and be able to stop it. Listening to those affected is a basic principle of user-based design and governance.
20. That is not, however, my focus today. Modern slavery is obviously a risk to people. But today I want to focus on the fact that is also a risk *to business* – a specific kind of risk. A governance risk. And one that is beginning to materialise in boardrooms, on balance sheets, and in Annual General Meetings, around the world.

21. What I want to put to you today is that boards that do not give modern slavery risks sufficient priority face a foreseeable risk of harm to the company, and risk being exposed to action for failure to act with reasonable care and diligence.

22. To make this argument, I am going to do four things:

    1. First, I want to explain why I think we should understand modern slavery as a governance risk.
    2. Second, I will use an analogy to climate risk to explain what kind of governance risk we are dealing with.
    3. Third, I will share with you some brand-new data helping us understand where modern slavery risks arise in the Australian market, and I will explain why I think those risks are growing.
    4. Fourth, I will share some thoughts about what we can do to better govern these risks, at the firm and market level.

Modern slavery as a governance risk

23. There is a growing understanding in Australian boardrooms that companies have a responsibility to respect human rights, and that to do so companies must identify and address risks to people.

24. This understanding is strongest in relation to modern slavery, both because of the social stigma attached, and because of the reporting obligations under the Australian *Modern Slavery Act 2018* (Cth).

25. In New South Wales, we are about to see a rise in awareness among the 400 public buyers, with annual procurement spending of over 42 billion Australian dollars, that now have mandatory modern slavery due diligence and reporting obligations under the *Modern Slavery Act 2018* (NSW).

26. There is a danger with this emphasis on due diligence and reporting: that governance bodies come to see modern slavery risk management as a narrow compliance question. The danger is that this leads to ineffective risk management that puts both people, and these organisations, at continued risk.

27. An important research report from ACSI published earlier this year, *Compliance without Ambition*, found that

    > *"while Australian listed companies are reporting their modern slavery risks at a basic level, only a small number of companies disclose more complex actions to manage those risks, including working with suppliers to build risk management capacity, consulting potentially affected groups or defining effectiveness to help track performance."*[7]

28. Boards that sign off on these Modern Slavery Statements must believe one of three things:

    1. That modern slavery risks do not pose risks to their business.
    2. That modern slavery risks *do* pose risks to their business, but they are not material, or
    3. That even if they do pose material risks, there is no *real* expectation on the part of markets or regulators that the business actively manage, mitigate or reduce these risks.

29. My view is rather different. I believe:

    1. that modern slavery risks can and do pose foreseeable risks to businesses,
    2. that those risks are material, and
    3. that owners, investors, regulators, and other stakeholders are increasingly explicit about – and acting on – their expectation that businesses effectively manage, mitigate and reduce these risks.

30. My belief is grounded in the evidence provided by the growing drumbeat of lawsuits, prosecutions, fines, seizures of goods, and shareholder actions over the last three years.

31. In October 2020, the Federal Court of Australia ordered Westpac to pay a 1.3 billion Australian dollar penalty for breaches of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), some of which involved misuse of Westpac's payment systems to pay for trafficking of children, overseas. This was the highest civil penalty in Australian history, and heads rolled. CEO Brian Hartzer stepped down and the board made a raft of changes.[8]

32. A few months later, in March 2021, US-listed shares of the world's largest rubber-glove maker, Top Glove, fell 6 per cent the day after US authorities ordered the seizure of its products on allegations Top Glove used forced labour in Malaysia.[9] In June, Top Glove postponed its planned listing on the Hong Kong Stock Exchange, due to the fallout. Top Glove ended up paying around AUD 48 million in compensation to workers trapped in debt bondage.[10]

33. It's worth noting that Australian manufacturer Ansell now faces litigation in the United States by 13 Bangladeshi workers who allege similar mistreatment in Malaysia.[11]

34. In June 2021 in France, prosecutors opened an investigation into Uniqlo, Inditex, Skechers and other global apparel retailers for concealment of crimes against humanity relating to their alleged use of Uyghur forced labour.[12]

35. In Germany, the Federal Office of Economics and Export Control is investigating similar allegations against Volkswagen, BMW and Mercedes Benz.[13]

36. In Canada, since July of this year the Canadian Ombudsperson for Responsible Enterprise has been investigating Nike and other companies for reliance on forced labour.[14]

37. And back in the US, customs authorities have seized goods worth more than 2.8 billion Australian dollars because they appear to be made with Uyghur forced labour.[15]

38. Owners are also increasingly active. Shareholder actions relating to forced labour have been brought at Adidas, Apple, BMW, Canadian Solar, Nike, Tesla, and Volkswagen, amongst others.

39. All of this is, I believe, evidence that market actors and regulators *already* expect businesses to respect the right to be free from modern slavery. Increasingly, that expectation is being codified as a matter of hard law.

40. The European Union is close to adopting a Corporate Sustainability Due Diligence Directive that would create binding human rights due diligence obligations for companies operating in the single market.[16] And it is also considering a forced labour instrument banning the import and sale of goods made with forced labour.[17] Both instruments will have significant impacts on Australian companies selling to, or receiving financing from, Europe.

41. Meanwhile, in Australia, the federal government is considering related steps. After reviewing the federal *Modern Slavery Act 2018* (Cth), Professor John McMillan AO recommended that the Act be amended to require companies to institute internal modern slavery due diligence systems.[18] And the Australian Labor Party has committed to pursue an import ban on goods made with forced labour.[19] A version of such a bill has already passed once through the Senate.[20]

42. All of this evidence suggests to me that there is a growing prospect of modern slavery risks showing up in Australian boardrooms, and on Australian balance sheets.

43. In fact, I would argue that modern slavery is, in Australia, the social risk that is *most* likely to materialise. If there is one social risk that boards should be worrying about, it's modern slavery risk.

Modern slavery as an environmental risk?

44. Modern slavery is also complicating boards' efforts to manage environmental risks.

45. There's now clear evidence that renewable energy value chains are highly exposed to modern slavery risks, through the use of forced and child labour to mine the cobalt used in lithium-ion batteries; through state-sponsored forced labour in the production of the polysilicon used in photovoltaic solar panels; and at other points in the renewables value-chain.[21]

46. Here, too, governments and other market actors are taking action. In the US, more than 2 GW of imported solar panels were detained in 2022.[22] Investors in Europe are tying financing of renewables projects to human rights due diligence measures.[23] And in Australia, we have even seen approval of a solar farm Development Application near Wagga Wagga tied to certification that the "manufacture of the solar panels" meets defined anti-slavery standards.[24]

47. Companies and investors face uncertainty about risks to supply, especially supply of photovoltaic solar panels; broader regulatory risks; uncertainty around costs of capital; and questions about potential shareholder and stakeholder actions.

48. Until there is greater clarity about market players', and governments', expectations on how these risks should be managed – an idea I will return to a little later – it seems clear that boards of companies exposed to renewable value-chains need to grapple with these risks and put effective risk management arrangements in place.

Learning from climate risk

49. In other ways, though, modern slavery risks and climate risks have much *in common*.

50. Both arise out of negative externalities generated by our existing approach to the production and distribution of goods, services, and value, in the global economy. In the climate context, the negative externality is carbon emissions, and their global heating effect. In the modern slavery context, the negative externality is the exploitation of vulnerable workers in complex global value-chains.

51. Just as we now understand that apparently harmless carbon emissions are, as they accumulate, wreaking havoc, so we are beginning to understand that modern slavery harms not only its direct victims but all of us, in 10 distinct ways[25]:

    1. It reduces productivity by driving down the equilibrium wage
    2. It creates inter-generational poverty and it
    3. institutionalises inequality
    4. It weakens economic multipliers. People can't spend or invest wages they aren't paid.
    5. It discourages innovation by employers. Why invest in technological gains if labour is operating at close to zero marginal cost?
    6. It leads to mispricing of capital, which can in turn lead to inefficient capital allocation across the economy, producing uncompetitive firms that get fat by relying on a coerced labour advantage. As places like Uzbekistan have learned, once these firms are exposed to global competition, they cannot keep up.
    7. Modern slavery weakens governance, since firms that are fat on rents from coerced labour have strong incentives to coopt politicians to provide top cover.
    8. In time, co-option induces corruption.
    9. It's also now pretty clear that modern slavery itself harms the environment. Firms that egregiously violate labour protections don't think twice about breaking environmental protections.
    10. And of course it hits the public purse, through reduced taxes and income, and increased healthcare, law enforcement and other support costs. In NSW, alone, we have estimated the cost of the current modern slavery caseload up to 9.6 billion Australian dollars.

52. The truth is that modern slavery is, like climate change, a product of system failure. The lawsuits, shareholder actions, fines, and import bans discussed earlier are the mechanisms by which market and government actors are beginning to internalise these negative externalities from business back onto balance sheets. They are the mechanisms by which the true costs of production and distribution are beginning to be priced back in.

53. The analogy to climate risk is instructive – because it points us to lessons from climate action that might shape how we take collective action to better govern modern slavery risks.

54. The first of these lessons is the need for reliable, firm-level data. Identifying carbon emissions at the unit level has been key to being able to set and enforce expectations around climate adaptation and mitigation.

55. Similarly we need reliable, scalable data on modern slavery risks to properly factor into business and investment decisions. Without this data we will struggle to set clear expectations, measure performance and understand the effectiveness of risk mitigation strategies.

56. Currently there is very limited reliable data available on modern slavery risk exposure, at the firm level. Commercial risk information providers tend to base company modern slavery risk ratings on assumptions that would be laughed off in other risk-management contexts, for example basing country-level risk factors on where a firm is domiciled, not where its workers are located.

57. This has plainly bizarre results. Can we really assess Apple's modern slavery risk exposure based on anti-slavery arrangements on the Channel Island of Jersey? Or Nestle's based on its domicile in Switzerland?

58. This is something I've been thinking about for some time. Today I'm pleased to reveal the first, preliminary results from a new approach to modelling firm-level forced labour risk that my Office is tentatively developing through a collaboration with Bridgewater Associates, Dun & Bradstreet, Google and the McCain Institute at Arizona State University. This collaboration was initially supported by The Rockefeller Foundation.

59. Over two years this multistakeholder collective has worked to develop a new tool for analysing forced labour risk within company operations. The tool is called the Forced Labor Open Risk Estimation Tool, or FLORET. It will be unveiled in New York ten days from now, but I have permission to share these exclusive early results with you today.

60. FLORET integrates large amounts of data, including, critically, data on firms' workforce location, sectoral business models, and country-level regulatory arrangements, to estimate the forced labour risk in that firm's operations. Unlike many existing risk information offerings, it does *not* look at firms' modern slavery risk management arrangements. FLORET aims to build a baseline understanding of the *inherent* risk associated with different firms and business models, while leaving other providers to then figure out the *residual* risk once a firm's risk management arrangements are factored in.

61. The aim of all project partners is to make this analysis available on an 'open' basis, to encourage integration of forced labour risk data into analytics, particularly amongst institutional investors.

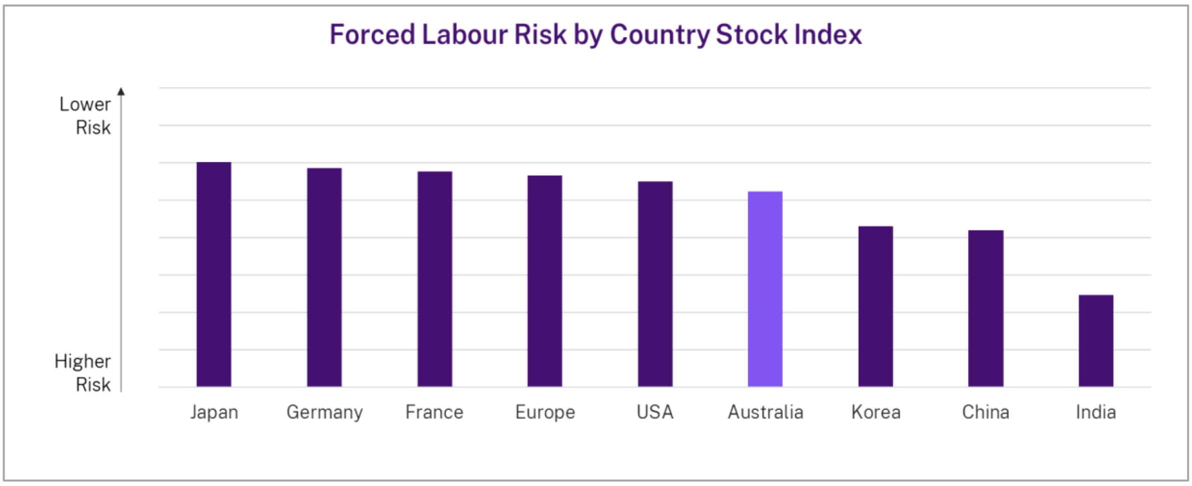
62. FLORET has been designed specifically with institutional investors in mind – indeed, Bridgewater Associates, the investment management firm founded by Ray Dalio almost fifty years ago – has been integral to its development, though I stress that what I share here involves no Bridgewater data or analytics.

63. So what does FLORET tell us? A great deal at the firm level. For our first analysis, we have used FLORET to identify the inherent modern slavery risk in the operations of all the firms listed on the world's major stock indices, including the ASX. Here is what we found.

Forced labour risk on the ASX

64. In this slide, the taller the bar, the lower the risk. As you can see, FLORET estimates that firms on the ASX have a higher level of forced labour risk in their operations than other developed world stock indices, though lower than those in emerging markets such as Korea, China and India.

65. Let me say that again: firms on the ASX are *more* exposed to modern slavery risks than those on other developed world stock indices.

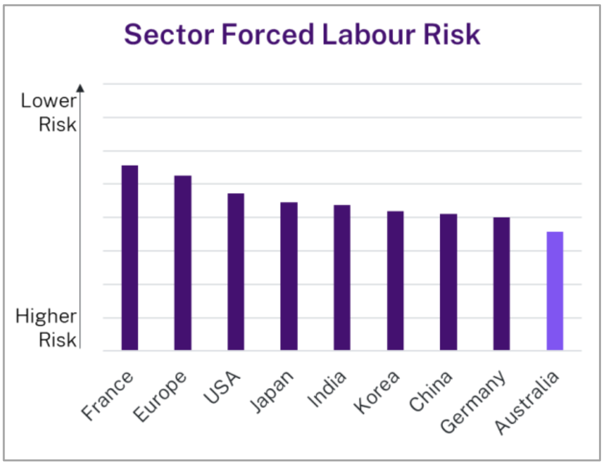


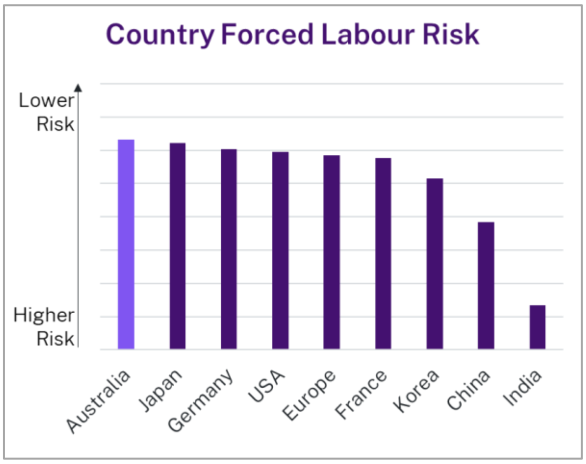
Courtesy of FLORET

66. Using FLORET, we can also dig into what *drives* risk. Is it the way the business models in the sectors represented in that particular firm or index operate? Does it have to do with the way modern slavery risks are regulated and governed in the countries in which the firm operates and its workers work? Or something else?

Drivers of forced labour risk on the ASX

67. Here are those results. Across the ASX most of this risk is driven by the sector composition of ASX companies, while Australia actually performs similarly or slightly better than other developed markets based on the country of operations of its constituent firms.



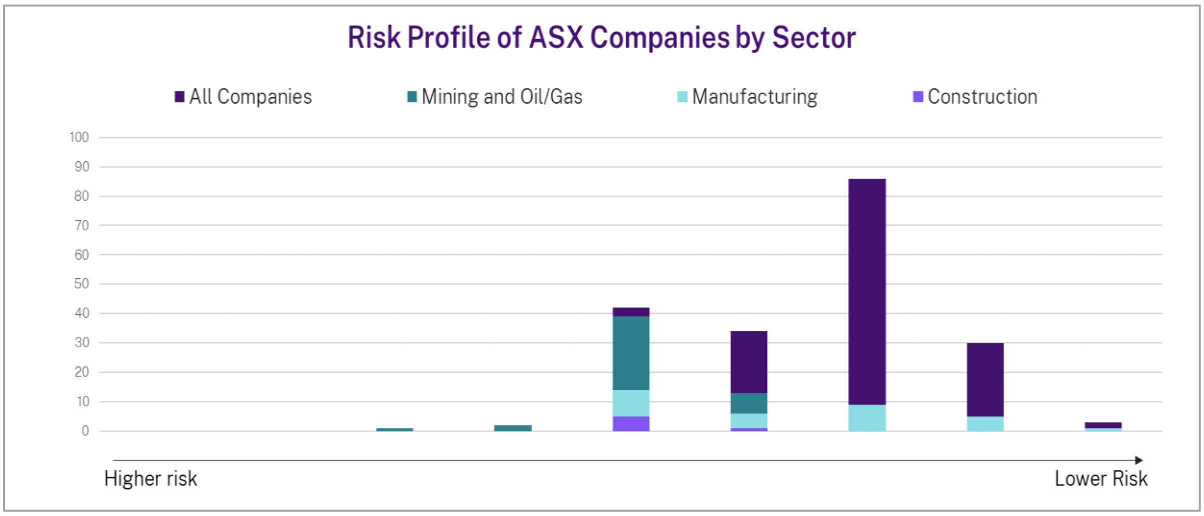


Courtesy of FLORET

Which sectors are driving risk in the ASX?

68. FLORET estimates that the sectors driving risk in the ASX are those further up the value chain such as mining, oil/gas extraction, manufacturing, and construction. In some ways this is not surprising. Modern slavery risks tend to be higher in sectors that rely more on lower-skilled labour.

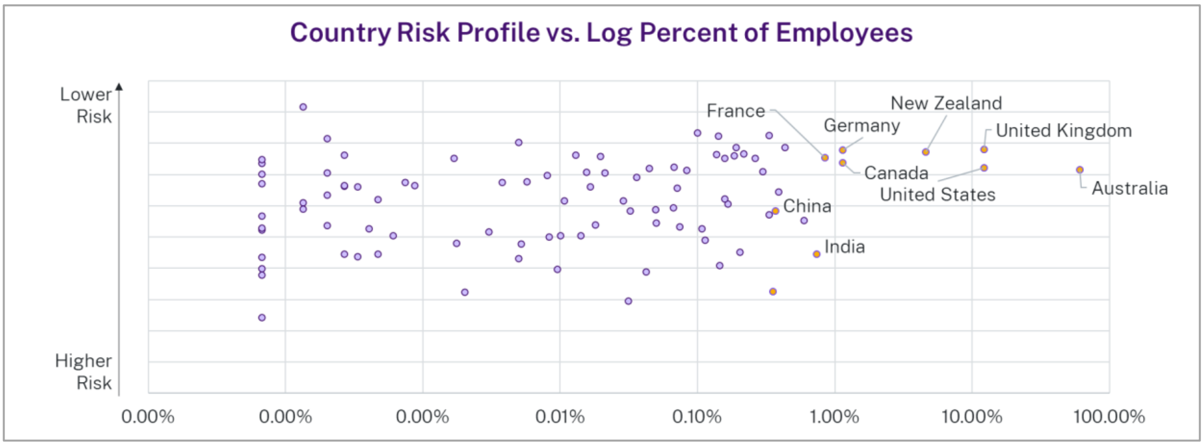
69. And just a reminder here – this preliminary analysis is looking at risks *in operations*. We have not yet extended the analysis to supply-chains, which requires a more complex nested risk analysis. We will be undertaking this more advanced analysis in the coming months.



Courtesy of FLORET

ASX risks broken down by workforce geography

70. That point becomes important in understanding this next slide. This shows how risk relates to where ASX-listed companies' workers are based. Most direct employees of ASX-listed companies are located in lower-risk countries. This picture is likely to change when we look more into different layers of the supply chain in months ahead.



Courtesy of FLORET

Australian risks may be growing

71. As we look into these risk factors, we see modern slavery risks arising where businesses rely on vulnerable workers who are easily exploited and easily silenced. From what I've seen in my role as the independent NSW Anti-slavery Commissioner over the last year, those risks may actually be *growing* here in Australia.

72. I've spent a lot of time over the last year listening to vulnerable workers – and in particular to temporary and seasonal migrant workers operating under government sponsored work schemes.

73. Our horticulture, agriculture, and meat processing sectors are increasingly looking to these workforces. And there are signs that aged care may also be moving in this direction.

74. The problem is not reliance on temporary migrant workers. These schemes can offer win-wins, for our firms and communities, and for the communities from which these workers travel.
75. No, the problem is in the governance of the schemes and these workforces, by governments and by the market. Despite considerable investment in formal oversight, compliance and modern slavery due diligence, social audits, and certification schemes, I have received information suggesting that hundreds of workers are falling out the bottom of these schemes into destitution.
76. Just last week I was in New South Wales' Riverina region, where I received truly disturbing information about treatment of temporary migrant workers that points to forced labour, debt bondage, deceptive recruiting, and possibly even sexual servitude.
77. It's no wonder we see hundreds of workers disengaging from these programmes. But when they do, they are basically left destitute. They have no income, often no accommodation, and sometimes no access to healthcare.
78. As a result, police are reporting an increase in petty theft and shoplifting, some signs of increased serious organised crime as destitute workers are manipulated into forced criminality – and, worryingly, a spike in presentations for maternity care by pregnant female workers who have received no antenatal care.
79. Talk about negative externalities. This has the makings of a serious public health and social disorder problem in the communities where these disengaged workers are being dumped. Local communities are often being left to fend for themselves, providing humanitarian care to these disengaged workers.
80. All of this risks putting the social licence for these schemes, and for the companies and sectors that rely on these workforces, at risk. To my mind, this is a clear, foreseeable risk for the companies relying on these workforces, and something that their boards should be actively addressing.
81. This is not an abstract or theoretical modern slavery risk arising in the factory of some fourth or fifth tier supplier overseas. This is modern slavery on our shores, just one or two steps down the supply-chain, or even in some companies' own operations.
82. And there are broader economic and political governance questions here. Do we want our economy to move to a guestworker or kafala-style labour model, with all the risks that brings with it? Or do we want to take a different path?

What we can do about it

83. The approach we are taking at the moment to governing these risks is not sufficient. I think we need to do two things.

A shift in mindset

84. First, we need a shift in mindset. We need to stop seeing modern slavery risk as a compliance concern, and treat it as a governance risk. We need to see that modern slavery risk is, like the negative externality of climate risk, and like other forms of entrenched rent-taking, a product of poor governance at the system level. It's a system failure that requires a collective action response.
85. Compared to environmental risks and climate action, our thinking on how to identify, measure and manage these risks through collective action at the market level remains underdeveloped.

86. I remain hopeful that the federal government's response to the McMillan Review of the Australian *Modern Slavery Act 2018* will seize this opportunity. One of the key ideas in that review was that reporting businesses should be obliged to have a "due diligence system" in place.[26]

87. This would be an important step forward, especially if the legislation is written in such a way that it ensures oversight of the *effectiveness* of such due diligence systems. Without that safeguard, the risk is that the due diligence system requirement is treated, once again, as a mere compliance exercise.

Learn from climate action

88. A major lesson from climate action is, however, that we cannot always wait for government regulation to propel effective market-level governance of system-level risks. Sometimes the market has to develop those responses itself.

89. We can take inspiration from climate action. Inspiration in terms of our ambition, our strategic goal. Just as with climate and natural resources, the goal should not simply be derisking, but rather the movement towards **a more regenerative and circular approach** to governing this risk at the system level.[27] For modern slavery, this regenerative approach means treating workers as sources of value-creation to be invested in, not as what Professor Kevin Bales has called 'disposable people'.

90. We can also take inspiration from climate action on the ***systems*** we need to put in place to move markets towards this approach.

91. As with climate risk, we need more reliable **firm-level data**. At present firms treat modern slavery work as a cost centre, a defensive compliance and de-risking play. Better data on firm level risk will help firms begin to see the value creation opportunities here. In time this will spur investment innovation around sustainability bonds and sustainability-linked finance, perhaps even second-generation ESG funds that invest in "modern slavery improvers" or in firms that unlock larger anti-slavery gains, like responsible recruitment services or worker voice platform providers.

92. Improved firm-level data will also draw in **insurance providers**. Already British and European insurance markets are writing marine cargo policies with modern slavery clauses, in response to the rise of forced labour import bans. I suspect, given the rise of shareholder actions and litigation on modern slavery risks, we will also soon see modern slavery risks reflected in directors and officers insurance.

93. Next, as with climate risk, we need a clear **taxonomy**. I welcome the initiative taken by the federal government to develop a Sustainable Finance Taxonomy, and the early signals from the Australian Sustainable Finance Institute that modern slavery issues will be addressed through its Do No Harm expert advisory group.[28] I urge the Institute, and indeed the Australian government, to ensure the taxonomy is developed in a way that encourages meaningful action to actively reduce modern slavery risks, and does not simply encourage a tick-a-box compliance exercise. And I stand ready to assist with that effort.

94. Third, as for climate risk, we need to see a rapid move by institutional investors towards **active ownership**, with shareholders holding directors and boards to account for their failure to mitigate risk. I welcome the active engagement work being done by Investors Against Slavery and Trafficking Asia-Pacific.[29]

95. Shareholder actions will also be critical. To my knowledge, there have been only two serious shareholder actions brought to ASX companies around modern slavery issues, one in the food retail sector, one in the real estate sector (relating to cleaning services). Both appear to have achieved some success, inducing changes from

management. Investors should be looking to those precedents to use their leverage more proactively to drive change.

96. Fourth, **system-level actors** also have key roles to play, especially around clarifying expectations and market norms, and enforcing them.

97. The **ASX** could be thinking about how it can use its leverage to encourage efforts to tackle modern slavery. The Stock Exchange of Thailand and the Johannesburg Stock Exchange have adopted modern slavery specific guidance and disclosure arrangements.[30] Why not us?

98. The **Australian Competition and Consumer Commission** could clarify the basis for pre-competitive collaboration to tackle modern slavery risks.

99. On my own part, I recently announced a process to develop a **Code of Practice for managing modern slavery risks in renewable value-chains**, in collaboration with the Clean Energy Council. We expect it to be picked up both by public buyers in New South Wales and by private firms. The aim is to provide an open standard that can be used in a variety of ways to underpin risk management and performance measurement.[31]

100. One way to do this is through **audits**. In New South Wales, the Auditor-General has a new, untested, "modern slavery audit" power which she can use to assess the efforts of government agencies and others to tackle modern slavery risks. It could be useful to see a similar arrangement at the federal level.

101. And finally, there is the key role of the **Australian Securities and Investment Commission**. If ASIC is considering taking action against boards that fail adequately to consider cybersecurity risks, as its Chairman recently signalled, perhaps it is just a matter of time before it considers action against boards that fail adequately to consider and address modern slavery risks.[32]

Anti-slavery as a form of stewardship

102. Friends: effective management of modern slavery risk requires us to move away from a *compliance* mindset to an approach that invests in relationships with stakeholders that create shared value.

103. Put another way, anti-slavery in the investment context is a form of stewardship. It is about exercising rights and leverage to protect and enhance long-term investment value for beneficiaries, by promoting sustainable value creation in invested companies.[33] It is about turning away from an extractive, rent-taking approach that treats humans as disposable people, towards long-term shared value-creation through protecting workers' human rights.

104. After a weekend that poses major questions for our community about how we intend to listen to, work with, and partner with those who have been rendered voiceless – people who have, in fact, survived modern slavery – it is all the more important that we commit to this long-term, partnership-based approach to governance.

105. I offer my co-operation in months and years ahead to all of you who wish to work together to combat modern slavery and its legacies in this way. Thank you.

Notes

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