

# Transparency in Supply Chains Acts in the United Kingdom and California

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Since 2010, *California* has required that certain companies provide information regarding their efforts to eradicate slavery and human trafficking from supply chains. Similar legislation is now popping up across the pond with the *United Kingdom* recently passing a law that calls for the reporting of steps taken to prevent slavery and human trafficking from entering supply chains. This is a clear sign that companies must continue their endeavors to both know their supply chains and report on what they are doing to help fight the exploitation of men, women, and children in countries throughout the world.

## The U.K. Modern Slavery Act of 2015

California is no longer alone in its fight to eradicate human trafficking through supply chain monitoring. This year, the United Kingdom proposed a new law aimed at ending human trafficking that substantially overlaps with the ***California Transparency Act***. Titled the ***U.K. Modern Slavery Act of 2015*** (the U.K. Act), it received Royal Assent March 26, 2015 and is now an Act of Parliament. Reporting obligations under the U.K. Act should come into force later this month.

The U.K. Act broadly requires that any company that “supplies goods or services” and “carries on a business, or part of a business, in any part of the United Kingdom” publically disclose the steps it is taking to ensure slavery or human trafficking is not taking place in its business and supply chains. A slavery and human trafficking statement is either a statement of the steps the organization has taken during the financial year or a statement that the organization has taken no such steps. Similar to California, the U.K. Act requires that if the organization has a website, it must publish the slavery and human trafficking statement on the website and include a link to the slavery and human trafficking statement in a “prominent place on that website’s homepage.”

## U.K. Act Requirements

There are some slight differences between the two Acts. For example, the U.K. Act does not limit a company’s annual worldwide gross receipts to over \$100 million. Rather, a commercial organization with some activities in the U.K. with a global revenue of more than £36 million will be required to make disclosures. Further, it is likely that the statement will need to include information about the

following: (a) the organization's structure, its business and its supply chains; (b) its policies in relation to slavery and human trafficking; (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains; (d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk; (e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; and (f) the training about slavery and human trafficking available to its staff. Additionally, depending on the organization's structure, the statement must be signed by either a director, member, general partner or partner.

Guidance on the terms of the U.K. Transparency Act is expected to be published in the coming weeks.

### **The California Transparency in Supply Chains Act of 2010**

The California Transparency in Supply Chains Act of 2010 (the California Act) came into effect Jan. 1, 2012. Over the last several months, the Attorney General issued a comprehensive [Resource Guide](#) and numerous letters in an effort to assist covered companies in complying with the California Act.

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