

Slavery and Human Trafficking — How to Build Your Compliance Program

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The ***California Transparency in Supply Chains Act of 2012*** (“***California Act***”) applies to retailers and manufacturers with annual worldwide gross receipts over \$100 million that are doing business in California. Those entities are required to disclose (by statements posted on their websites) their efforts to eradicate slavery and human trafficking from their direct supply chains for goods that are offered for sale. These disclosure requirements are currently in effect.

The ***UK Modern Slavery Act 2015*** (“***UK Act***”) became effective on October 29, 2015 and is broader than the California Act. It requires sellers of products or services with annual turnover of £36 million (approximately \$56 million) that carry on a business or part of a business in the UK to disclose their efforts to eliminate slavery from their operations and from all of their supply chains (not just from their direct supply chains). The disclosure required by the UK Act is also a statement that is posted on the company’s website. The earliest required posting of these statements is required by October 31, 2016 (for companies with financial year-ends on March 31, 2016).

What steps should a company take to develop its initial slavery and human trafficking compliance program? Or what steps should a company take to expand its existing compliance programs to meet the various slavery and human trafficking requirements in an effective, efficient way?

You should consider [some of these best practices](#) in building your own compliance program.

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