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Enactment	Jurisdiction	Disclosure Requirements	Non-Disclosure/ Substantive Requirements	Penalties	Effective Date
<a href="#"><u>California Transparency in Supply Chains Act (SB657)</u></a>	All companies that are: <ol style="list-style-type: none"> <li>1. Retail seller/ manufacturer (based on tax status);</li> <li>2. With annual gross worldwide receipts exceeding \$100 million; and</li> <li>3. "Doing business" in California (property or salaries in California exceeding \$50K).</li> </ol>	Disclosure must address what, if anything, done to: <ol style="list-style-type: none"> <li>1. Verify supply chain to evaluate/ address "risks of human trafficking and slavery."</li> <li>2. Audit suppliers to evaluate compliance with company standards. Unannounced and through independent auditors?</li> <li>3. Obtain certification from direct suppliers that materials incorporated into goods comply with local anti-trafficking and slavery laws.</li> <li>4. Maintain internal "accountability standards and procedures" for those who fail to meet your standards.</li> <li>5. Provide training to employees/ management with supply chain responsibility (focus on mitigating supply chain risks and identifying trafficking).</li> </ol> <p>Note: Disclosures must be on internet homepage. Homepage disclosure must be through a "conspicuous" and "easily understood" link to full-text document.</p>	None	<ul style="list-style-type: none"> <li>• California Attorney General Injunction for non-compliance.</li> <li>• Potential class action lawsuits for false or misleading declarations.</li> </ul> <p>Consumer and advocacy group actions</p>	January 1, 2012
<a href="#"><u>Executive Order on Trafficking in Government Contracts (EO 13627) - The final rule amends</u></a>	Applies to all Federal Contractor for Goods/Services (size/nature of contract irrelevant)	For contracts for Services or Supplies that are not off the-shelf items that (1) Exceed \$500,000 and (2) to be performed outside U.S., contractors and subcontractors must create and post at the workplace and on their	Federal contractors, subcontractors, their employees and their agents prohibited from engaging in human trafficking, as evidenced through:	<ul style="list-style-type: none"> <li>• Imprisonment: "Knowing and willful" false certification is a crime. Reckless</li> </ul>	March 2, 2015



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<a href="#">Federal Acquisition Regulation Subpart 22.17 and Contract Clause 52.222-50</a>		company website a formal compliance plan including various categories of information.	<input type="checkbox"/> Using forced labor <ul style="list-style-type: none"> <li>• Misleading/fraudulent recruitment practices</li> <li>• Charging recruitment fees</li> <li>• Destroying, concealing, confiscating, or otherwise denying employee access to his or her identity docs</li> <li>• Failing to pay return transportation costs</li> <li>• Failing to provide employment agreement (if required) in employee's native tongue and prior to employee's departure from home country.</li> </ul> Contractors and their subcontractors must agree to: <ul style="list-style-type: none"> <li>• "Cooperate fully" with, and provide reasonable access to, agencies conducting investigations into, among other things, violations of this order</li> <li>• Self-report, among other things, "activities that ... are inconsistent with the requirements of this order or any other applicable law or regulation</li> </ul> Contract for Services or Supplies that are not off the-	disregard or conscious avoidance of truth qualify as "knowing." Consequences include up to five years imprisonment and \$250K fine. <ul style="list-style-type: none"> <li>• False Claims Act: Government Fraud (31 U.S.C. §3729).</li> <li>• TVPA (22 U.S.C. § 7104(g): Federal agency may terminate your contract.</li> <li>• Debarment: Business death knell for non-compliance (9.406-2).</li> <li>• Loss of award fee or termination of contract</li> </ul>	



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			shelf items that (1) Exceed \$500,000 and (2) to be performed outside U.S.		
<a href="#"><u>Business Transparency on Trafficking and Slavery Act of 2014 (pending legislation - HR 4842)</u></a>	All companies that are: 1. Publicly traded; <i>and</i> 2. Have annual gross receipt in excess of \$100 million	Annual filing with SEC of report titled "Policies to Address Forced Labor, Slavery, Human Trafficking and the Worst Forms of Child Labor."	None	<ul style="list-style-type: none"> <li>SEC action for failure to adequately comply.</li> <li>Potential class action lawsuits for false or misleading declarations.</li> <li>Consumer and advocacy group actions</li> </ul>	Depends on if/when pending legislation passed
<a href="#"><u>UK Modern Slavery Act of 2015 (Part 6 - Transparency in Supply Chains Disclosures)</u></a>	All companies that are: 1. Supplier of goods and/or services 2. Corporation or partnership (wherever incorporated or formed) carrying on "a business, or part of a business," in any part of the UK? 3. With a total annual turnover exceeding [amount to be determined by Secretary of State regulations]	Statement detailing steps taken during the past financial year to ensure slavery and human trafficking are not taking place in (1) any of company's supply chains and (2) any part of its business. Approved/signed disclosure Statement may include information concerning: <ul style="list-style-type: none"> <li>Company's structure/ business/supply chains</li> <li>Anti-trafficking/ slavery policies</li> <li>Anti-trafficking/ slavery due diligence processes</li> <li>Identification and management of Higher-risk areas in business/ supply chains</li> <li>Effectiveness assessment, of measures, based on performance measures company considers appropriate</li> </ul>	None	<ul style="list-style-type: none"> <li>High Court Injunction (civil action brought by Secretary of State)</li> <li>In Scotland only, action for specific performance s of a statutory duty under § 45 of the Court of Sessions Act 1988</li> </ul>	Royal Assent Received March 26, 2015



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		<ul style="list-style-type: none"> <li>• Anti-trafficking/ slavery trainings available to staff</li> </ul>			
<a href="#"><u>Directive of the European Parliament and of the Council Concerning Various Disclosures</u></a>	“The proposal provides that large companies should disclose non-financial information under a set of requirements devised to increasing transparency with the objective of strengthening the company's transparency and accountability, while limiting any undue administrative burden.”	“Article 1 (a) of the proposal will require certain large companies to disclose a statement in their Annual Report including material information relating to at least environmental, social, and employee-related matters, respect of human rights, anti-corruption and bribery aspects. Within these areas, the statement will include (i) a description of its policies, (ii) results and (iii) risk-related aspects.”	None	Uncertain	N/A