



# UNRAVELLING EXPLOITATION

Exposing the Need For Responsible  
Business Laws in Fashion Supply Chains.

**WHAT SHE  
MAKES**  
IS KEEPING HER IN POVERTY



**OXFAM**  
Australia

## © OXFAM AUSTRALIA, AUGUST 2025

Oxfam Australia 'Ngapa'  
355 William Street,  
West Melbourne, VIC 3003  
Australia

[enquire@oxfam.org.au](mailto:enquire@oxfam.org.au) | [www.oxfam.org.au](http://www.oxfam.org.au)

**Cover image:** Dhaka, Bangladesh: Mother of three, Sabana\*, has been working in a garment factory for nearly 10 years. She makes 9,300 BDT per month (AUD \$118) by working 56 hours a week. **Photo:** Fabeha Monir/Oxfam. \*Name changed to protect identity.

**Acknowledgements:** Many colleagues helped develop this report, including Dilruba Shimo, Tarek Aziz, Mahmuda Sultana, Dabaraj Dey, Shahajadi Begum (Oxfam in Bangladesh), and Nayeem Emran, Sarah Rogan, Vanessa Little, Rod Goodbun, Emily Bushell and Lucy Brown (Oxfam Australia). Oxfam Australia also thanks Karmojibi Nari and Dnet in Bangladesh for their support in collecting the data that underpins this report.

## PUBLISHED BY OXFAM AUSTRALIA, MELBOURNE, AUGUST 2025

**Authors:** Nina Crawley (Oxfam Australia),  
Isabella McMahon (Oxfam Australia)

**Contributor:** Freya Dinshaw (Human Rights Law Centre)

**Editor:** Deirdre Smith

**Designer:** Twofold

**With support from:**

Human  
Rights  
Law  
Centre.

## OXFAM AUSTRALIA RESEARCH REPORTS

Oxfam Australia Research Reports are written to share research results, contribute to public debate and invite feedback on development and humanitarian policy and practice.

**Disclaimer:** The views of this publication are those of the authors and do not necessarily represent those of Oxfam Australia or any funding agency.

**Statement of copyright:** This publication is copyright but the text may be used free of charge for advocacy, campaigning, education and research, provided the source is acknowledged in full. The copyright holder requests that all such use be registered with Oxfam Australia for impact assessment purposes. For copying in any other circumstances, for re-use in other publications, or for translation or adaptation, permission must be secured and a fee may be charged. Email [enquire@oxfam.org.au](mailto:enquire@oxfam.org.au). The information in this publication is correct at the time of publishing.



# CONTENTS

|   |           |
|---|-----------|
| RECOMMENDATIONS TO GOVERNMENT   | 2         |
| RECOMMENDATIONS FOR BRANDS  | 3         |
| EXECUTIVE SUMMARY   | 4         |
| GLOSSARY  | 6         |
| <b>1. EVIDENCE OF EXPLOITATION IN THE GLOBAL GARMENT INDUSTRY</b>     | <b>9</b>  |
| 1.1 Child labour  | 9         |
| 1.2 Forced labour   | 14        |
| 1.3 Excessive overtime  | 17        |
| 1.4 Withheld wages  | 18        |
| 1.5 Evidence of insecure work and abusive working conditions          | 19        |
| <b>2. DRIVERS OF MODERN SLAVERY AND EXPLOITATION</b>                  | <b>23</b> |
| 2.1 Workers' understanding of their rights and freedom of association | 23        |
| 2.2 Poverty wages   | 26        |
| 2.3 Poor purchasing practices and the use of subcontractors           | 28        |
| <b>3. AUSTRALIA'S EXPOSURE</b>  | <b>34</b> |
| <b>4. THE CURRENT LEGISLATIVE FRAMEWORK AND KEY REFORMS</b>           | <b>35</b> |
| <b>5. WHAT MIGHT DUE DILIGENCE LOOK LIKE IN THE FASHION INDUSTRY?</b> | <b>39</b> |
| 5.1 Responsible purchasing practices                                  | 40        |
| 5.2 Worker-led due diligence and trade unions                         | 41        |
| CONCLUSION  | 45        |
| APPENDIX 1: APPROACH AND METHODS                                      | 47        |
| BIBLIOGRAPHY  | 48        |



# RECOMMENDATIONS TO GOVERNMENT

## 1. Amend the *Modern Slavery Act 2018* to require companies to undertake 'human rights due diligence' to address modern slavery.

The Modern Slavery Act should be strengthened by introducing a clear legal duty on companies to take action to prevent modern slavery. This would mean businesses must take reasonable steps to identify, prevent and address risks of forced and child labour in their operations and supply chains, and face consequences where they fail to do so.

## 2. Urgently take concrete steps to introduce comprehensive responsible business laws that require large companies to undertake human rights and environmental due diligence.

In order to effectively tackle the root causes of modern slavery and broader labour rights abuses, Australia should introduce new standalone laws that would hold companies accountable for serious human rights harms.

These laws should:

- Require companies to prevent harm before it occurs, address damage caused, and be held accountable for human rights and environmental impacts across their operations and supply chains.
- Incentivise meaningful engagement with rights-holders - workers, their representatives and wider communities in key phases of the due diligence process.
- Include strong enforcement mechanisms, with mandatory obligations, sanctions, and access to remedy for affected people.
- Address a broad range of human rights - including wages and environmental harms, not just modern slavery.

## 3. Introduce an import ban on goods made using forced labour.

The 2021 Australian Senate inquiry into the Customs Amendment Bill made unanimous recommendations in support of a broad-based import ban, modelled on the United States

Tariff Act. An import ban would complement due diligence laws, strengthening Australia's overall response to modern slavery and ensuring businesses are not profiting from exploitation.

The design of an import ban should ensure:

- The burden of proof rests with companies to demonstrate their goods are free from forced labour, through an evidence-based enforcement regime.
- Australian Border Force is empowered to block targeted shipments with reasonable evidence of forced labour until remediation has occurred.
- Consequences for non-compliance are sufficient to drive corporate action and improve conditions for workers in garment supply chains.
- Remediation for affected workers is embedded in the import ban framework to incentivise genuine improvements in working conditions, especially in high-risk sectors like the garment industry.

## 4. Use public procurement processes to reward companies that address human rights risks.

The Government should ensure that it uses its commercial power to encourage companies to take human rights and modern slavery seriously. Companies that can demonstrate meaningful measures to address human rights risks should be prioritised during tender processes, while non-compliant companies should be prohibited from bidding on public contracts.

## 5. Capacity building and awareness raising.

The Government should continue to support the capacity of businesses and workers in high-risk industries, such as the garment sector, to understand and promote human rights standards in supply chains. This could include providing training and resources to help companies undertake effective human rights due diligence, and empower workers to understand their rights.



Savar, Bangladesh: Workers in a garment factory in Savar. Photo: Fabeha Monir/Oxfam.

\* This image is for illustrative purposes Oxfam does not suggest any of these workers are subject to modern slavery.

# RECOMMENDATIONS FOR BRANDS

Brands should take a whole of business approach led by leadership, ensuring every department has a part to play and is resourced to support human rights and environmental due diligence.

## 1. Embed Worker-Led Due Diligence

Develop and implement human rights and environmental due diligence in collaboration with workers, their unions, and community representatives.

- Involve workers at every stage of the due diligence process – from risk identification to monitoring, evaluation, and remediation.
- Ensure policies are designed to address structural power imbalances between brands, suppliers and workers.
- Guarantee freedom of association and support union participation in audits, inspections, and ongoing risk assessments.
- Establish clear mechanisms for workers and unions to raise grievances and receive timely redress.

## 2. Adopt Responsible Purchasing Practices

- Ring-fence labour costs in all price negotiations to facilitate payment of living wages.
- Avoid short lead times, last-minute order changes, and other practices that create exploitative conditions.

- Include contractual clauses prohibiting child labour, forced labour, and unauthorised subcontracting.
- Develop the purchasing practices policy in consultation with unions and workers, and embed it across all departments and supplier relationships.
- Set measurable KPIs for responsible purchasing and report progress publicly.

## 3. Build Long-Term, Rights-Respecting Partnerships

Prioritise suppliers that meet robust human rights standards and foster ongoing collaboration.

- Establish direct relationships with trade unions in sourcing countries and involve them in risk prevention and mitigation.
- Work collectively with other brands, civil society organisations, and governments to address systemic risks and improve supplier compliance. Be transparent – share sourcing locations and prioritise transparency in collaborations.
- Offer training, capacity building, and long-term contracts to suppliers that commit to strong human rights standards.
- Be prepared to exit sourcing relationships where worker voice and representation cannot be safeguarded, relocating production to jurisdictions with stronger protections.



# EXECUTIVE SUMMARY

Oxfam Australia has a long-standing commitment to challenging exploitation in global supply chains. From championing the fair trade coffee movement to demanding safe working conditions after the 2013 Rana Plaza disaster in Bangladesh, and more recently advocating for living wages in the garment industry, our work has consistently focused on protecting the rights of workers vulnerable to exploitation in high-risk industries.

At its core, Oxfam Australia exists to fight poverty and inequality, and dismantle the structures that sustain it. The fashion industry in particular remains deeply problematic — shaped by power imbalances, opaque and tangled supply chains, and a legacy of racism and colonialism.

Globally, manufacturing, including the ready-made garment industry, is recognised as a high-risk sector for modern slavery. Australia's three largest garment-supplying countries<sup>1</sup> — China<sup>2</sup>, Bangladesh<sup>3</sup> and India<sup>4</sup> — are all classified as high-risk for modern slavery. Workers in these supply chains are exposed to various forms of exploitation, including child labour and forced labour.

Oxfam Australia's What She Makes campaign launched in 2017 and has been calling, in solidarity with workers, for a living wage for the women who make our clothes. Adults working full time should be paid a living wage, enough to afford a dignified life for themselves and their families. This basic tenet is underpinned by article 23 of the Universal Declaration of Human Rights<sup>5</sup>:

"Everyone who works has the right to just and favorable remuneration ensuring for himself

and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection."

Despite global efforts to raise wages, progress has been limited, with the fashion industry part of a wider system of inequality. Relying on brands primarily motivated by profit to voluntarily prioritise wages and human rights over profits, or on foreign governments constrained by powerful manufacturing lobbies and the pressures of attracting foreign investment, means that progress will be slow, fragile and easily undone.

Australia made some legislative steps towards protecting workers in international supply chains, such as the introduction of the *Modern Slavery Act 2018*, which has increased corporate awareness and accountability. However, the Act has not led to meaningful change in the behaviour of Australian fashion brands or their suppliers. Instead, it has largely become an exercise in transparency and risk assessment, rather than a tool for driving genuine reform<sup>6</sup>. Importantly for the current research, the Modern Slavery Act has a narrow focus with key rights and indicators of exploitation, including poverty wages, excessive overtime, lack of contracts, and freedom of association violations outside the scope of the current legislation.

Through years of work on labour rights issues, Oxfam Australia has seen firsthand the devastating impact of poverty wages on workers in Australian supply chains. These woefully inadequate wages affect every aspect

- 
- 1 World Intergrated Trade Solution, "Australia Textiles and Clothing Imports by Country in US\$ Thousand 2022," October 6, 2025, [https://wits.worldbank.org/CountryProfile/en/Country/AUS/Year/LTST/TradeFlow/Import/Partner/by-country/Product/50-63\\_TextCloth](https://wits.worldbank.org/CountryProfile/en/Country/AUS/Year/LTST/TradeFlow/Import/Partner/by-country/Product/50-63_TextCloth).
  - 2 "Modern Slavery in China," *Walk Free* (blog), accessed July 14, 2025, <https://www.walkfree.org/global-slavery-index/country-studies/china/>.
  - 3 "Modern Slavery in Bangladesh," *Walk Free* (blog), accessed July 14, 2025, <https://www.walkfree.org/global-slavery-index/country-studies/bangladesh/>.
  - 4 "Modern Slavery in India," *Walk Free* (blog), accessed July 14, 2025, <https://www.walkfree.org/global-slavery-index/country-studies/india/>.
  - 5 United Nations, "Universal Declaration of Human Rights," United Nations (United Nations), accessed July 14, 2025, <https://www.un.org/en/about-us/universal-declaration-of-human-rights>.
  - 6 Freya Dinshaw et al., "Broken Promises Modern Slavery Report: Two Years of Corporate Reporting under Australia's Modern Slavery Act," November 2022, <https://www.hrlc.org.au/app/uploads/2025/04/2211-Broken-Promises-Modern-Slavery-Report.pdf>.

of workers' lives<sup>7</sup>; they keep families malnourished, deny access to medical care, trap women in unsafe relationships, and curtail children's education.

Poverty wages are not just an economic issue; they are a violation of human rights. Yet, under the current legislative framework, wages are not considered. For some time, Oxfam Australia has recognised a clear link between poverty wages and the conditions that give rise to modern slavery. We have interviewed workers who were forced to continue working in the Rana Plaza building despite clear safety concerns<sup>8</sup>. We have heard countless stories of workers pushed to work excessive overtime, often to the detriment of their health, coerced by aggressive and sometimes violent supervisors<sup>9</sup>.

Oxfam Australia has also investigated purchasing practices and buyer behaviour, observing that the ruthless tactics employed by buyers, which focus heavily on fast turnaround, low cost and quality, often come at the expense of workers' pay and conditions<sup>10</sup>. We have seen how these practices create a shadow industry of home-based and subcontracted workers, who are frequently subjected to lower wages and far harsher conditions than their peers in export-oriented factories. However, this report marks the first time Oxfam Australia is sharing data on the harrowing conditions faced by subcontracted workers, including those employed illegally as child labourers. The testimonies of these workers are difficult to read, and include stories of violence and the exploitation of children.

"Children often cry when they are scolded or beaten, but they keep working. We feel bad for them, but we can't do anything — we're all afraid of losing our jobs." — Subcontracting worker.

Together, their voices are powerful and make a clear case for change.

This report presents evidence of widespread and systemic labour rights violations across Bangladesh's garment industry, with a particular focus on workers in subcontracted factories, informal workplaces, and home-based production. Drawing on more than one dozen focus group discussions and key informant interviews, it exposes how the current sourcing

model, from which international brands benefit, enables and sustains conditions that amount to modern slavery. The true reflection and extent of the risks and issues remain difficult to investigate, as respondents are often fearful of losing their jobs, while factories are concerned about jeopardising their business relationships. This challenge is further compounded by the existence of unauthorised subcontracting and the involvement of accessory suppliers who often operate outside formal oversight.

The Human Rights Law Centre has produced a number of publications to demonstrate that Australia's current laws are failing to protect workers from modern slavery. They have made a strong contribution to this report and made the legal case for change. As they have shown, the Modern Slavery Act relies on transparency and voluntary action, with no penalties for companies that fail to act. As a result, reporting has become a 'box-ticking' exercise for many brands, with little impact for the people making our clothes. While the 2023 review of the Act recommended stronger measures, including mandatory due diligence and penalties for non-compliance, progress has stalled. Meanwhile, other countries are moving ahead, introducing import bans on goods made with forced labour and requiring companies to take meaningful steps to prevent harm. Australia must catch up. We urgently need enforceable laws that make companies responsible for identifying and addressing risks in their supply chains. Anything less will continue to leave workers vulnerable and allow businesses to profit from exploitation with impunity, while risking Australia falling further behind its global peers.

Australia must act urgently to strengthen its modern slavery response and human rights regulatory framework by requiring companies to identify, prevent and remediate harm to people in their operations and supply chains, and banning imported goods made using forced labour. This would lead to safer workplaces, a fair day's pay for a fair day's work, a healthy environment that allows people to live a good life, and a chance for children to thrive. Workers and their families must be at the heart of Australia's response, so we can all be confident that the clothes we wear are not made at the expense of someone's dignity.

7 S Nayeem Emran et al., "Made in Poverty — The True Price of Fashion" (Melbourne, Australia: Oxfam Australia, 2019).

8 "Ajirun | Oxfam Australia," accessed July 14, 2025, <https://www.oxfam.org.au/what-she-makes/stories/ajirun/>.

9 S Nayeem Emran et al., "Made in Poverty — The True Price of Fashion" (Melbourne, Australia: Oxfam Australia, 2019).

10 Nayeem Emran et al., Shopping for a Bargain - How the Purchasing Practices of Clothing Brands in Australia Impact the Women Who Make Our Clothes (Oxfam Australia, 2020), <https://www.oxfam.org.au/wp-content/uploads/2022/12/Official-Shopping-for-a-Bargain-2020.pdf>.



Savar, Bangladesh: Workers in a garment factory in Savar. Photo: Fabeha Monir/Oxfam.

*\*This image is for illustrative purposes Oxfam does not suggest any of these workers are subject to modern slavery.*

## GLOSSARY

### BUYER

In the garment industry, a buyer refers to a global brand or retail company that places large-scale clothing orders with factories in Bangladesh. Buyers exert significant influence over production terms, timelines and prices, shaping the conditions under which factory owners and workers operate. Buyers may operate through buyers' agents or do direct procuring with factories.

### CHILD LABOUR

The International Labour Organization defines child labour as: "work that is hazardous to a child's health and development, demands too many hours and/or is performed by children

who are too young." Child labour is therefore contextual and somewhat determined by local laws. Many jurisdictions have different rules relating to children or adolescents, noting that some level of vocational engagement can be beneficial for adolescents. However, this work should not interfere with their schooling, physical or social development, and for this reason many jurisdictions will place limits on the hours and types of jobs adolescents can do.

### EXPLOITATION

Exploitation is a general term that includes slavery-like practices, is considered modern slavery, as well as a broader range of behaviours that, according to internal groups who enforce

labour laws, including the Australian Federal Police<sup>11</sup>, include but are not limited to workers:

- having little to no understanding of work rights and entitlements
- receiving threats against joining a union
- being subjected to security measures designed to keep them on the work premises
- lacking basic training and professional licences
- being disciplined through fines
- working in unsanitary and/or unsafe conditions
- being adequately dressed for the work they do, for example, lacking personal protective equipment (PPE) or warm clothing
- having their passport and other personal documents kept by the employer, with the worker not allowed to have them when they want them
- having no labour contract.

### EXPORT FACTORY

An export factory is a formally registered and relatively well-regulated garment factory that produces clothing directly for international brands or retailers. These factories are expected to comply with buyer codes of conduct and international labour standards — though enforcement can be inconsistent.

### FACTORY WORKER

A factory worker is employed in a centralised production facility by the employer or as a contractor. Unlike home-based workers, factory workers usually use machinery or equipment provided by the employer and are paid hourly wages or fixed daily rates. The level of worker protections can vary depending on the legal and regulatory environment. They may work for a wage or piece rate.

### FINISHER/FINISHING

A finisher performs the final steps in the garment production process, such as trimming excess threads, attaching buttons, ironing, folding or packing. Finishing is typically low-paid, repetitive work and may be carried

out either in factories or home-based settings, often under piece-rate arrangements.

### FORCED LABOUR

According to the International Labour Organization's Forced Labour Convention, 1930 (No. 29)<sup>12</sup>, forced or compulsory labour is: "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."

### HELPER

A helper is an entry-level garment worker, often responsible for basic support tasks such as fetching materials, cutting thread, or assisting machine operators. Helpers are frequently women, or are more likely to be child workers; they receive the lowest wages.

### HOME-BASED WORKER

A home-based worker carries out paid work from their home or a nearby space, rather than a traditional employer workplace. This includes subcontracted homeworkers who receive raw materials or instructions from employers or intermediaries, are paid per piece, and bear many production costs themselves (like utilities and equipment). In the garment sector, home-based workers — often women — perform tasks like sewing, embroidery or packing under piece rate, or contracts set by outside agents<sup>13</sup>.

### LEVERAGE

According to the United Nations Guiding Principles on Business and Human Rights, "Leverage is considered to exist where the enterprise has the ability to effect change in the wrongful practices of an entity that causes a harm<sup>14</sup>." Brands that buy a high percentage of a factory's output would have high leverage with that factory. However, there are other ways to increase leverage, such as through cooperation and training. Leverage is a key concept in mandatory human rights due diligence and companies should always be acting to maximise their leverage to prevent and remediate harmful practices.

11 "Human Trafficking and Exploitation - AFP," accessed July 21, 2025, <https://www.afp.gov.au/crimes/human-trafficking-and-people-smuggling/human-trafficking-and-slavery>.

12 "Convention C029 - Forced Labour Convention, 1930 (No. 29)," ILO, June 10, 1930, [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C029](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029).

13 "Home-Based Workers - HomeNet International - Home-Based Workers," HomeNet International, n.d., accessed July 27, 2025, <https://www.homenetinternational.org/about/home-based-workers/>.

14 "Guiding Principles on Business and Human Rights, Implementing the United Nations 'Protect, Respect and Remedy' Framework" (Geneva and New York: United Nations, 2011).

## **MODERN SLAVERY**

Modern slavery is a broad definition that applies to criminal, slavery-like practices, including servitude, forced labour, deceptive recruiting, debt bondage and the worst forms of child labour. The *Modern Slavery Act 2018* covers these illegal practices, in addition to human trafficking and forced marriage.

## **PURCHASING PRACTICES**

Purchasing practices refer to the decisions and behaviours of buyers when sourcing garments — such as pricing, lead times, order volumes and payment terms. Aggressive purchasing practices by buyers often lead to excessive pressure on factories, resulting in wage violations, excessive overtime and increased subcontracting.

## **SUBCONTRACTING AGENT**

An intermediary who facilitates the outsourcing of production work from a primary supplier or manufacturer to others. These may be compliant subcontracting factories, or smaller or informal factories or home-based workshops.

## **SUBCONTRACTING FACTORY**

A subcontracting factory is a smaller, often informal or unregistered facility that receives work orders from larger factories. These factories often, but not always, lack direct relationships with international buyers and operate with fewer regulations, lower wages and weaker safety and labour protections.

## **SUBCONTRACTING WORKER**

A subcontracting worker is employed via agents to complete work that a main brand or contractor has commissioned, which has ultimately been sent to smaller firms. These workers may operate either at home or in small workshops, producing goods under indirect or direct supervision. This model often leads to multiple tiers of subcontracting between brands and the workers actually undertaking the work.

## **WOMEN'S CAFE**

A women's café is a safe, worker-run space where women workers can access support services such as legal advice, healthcare referrals, labour rights education and counselling. These cafés are often supported by NGOs or unions to empower women workers and address issues like harassment and exploitation.

# 1. EVIDENCE OF EXPLOITATION IN THE GLOBAL GARMENT INDUSTRY



There is decades' worth of documented evidence exposing exploitation, modern slavery and child labour within global garment supply chains. Walk Free's recent global slavery index<sup>15</sup> paints a similar picture to the data we gained from surveys and focus groups: that these abuses persist, despite the introduction of legislation in multiple jurisdictions aimed at addressing them. **Our findings reveal ongoing instances of modern slavery and child labour in international supply chains**, as well as widespread practices, not covered by the current Modern Slavery Act, that significantly increase the risk of modern slavery. These include the withholding of wages and personal documents, excessive and unpaid overtime, forced labour and incidents of violence and harassment.

Our interviews, as well as recent extensive research from Goodweave<sup>16</sup>, underscore the risk that Australian brands may be unknowingly benefiting from these practices, due to the opaque systems of subcontracted factories and home-based work enabled by irresponsible purchasing practices, insufficient social governance and freedom of association, and ineffective legislation in sourcing and manufacturing countries.

These systemic issues demand urgent and coordinated action from governments, fashion brands, trade unions and NGOs. The Australian Government is well positioned to strengthen

the legal framework for addressing modern slavery, join global efforts, drive greater cooperation to tackle these entrenched abuses, and make meaningful change that positively impacts the workers making our clothes.

## 1.1 Child labour

### CHILD LABOUR IN BANGLADESH

According to the Bangladesh Labor Act 2006 a child is someone who "has not completed their 14th year of age". There are provisions for adolescents (15–17 years old) to work, but adolescents should not be working in a factory for more than five hours per day or 30 hours per week. The law prohibits adolescents from partaking in any hazardous tasks, which includes dyeing or bleaching textiles, weaving, and doing informal garment sector work<sup>17</sup>.

Despite this, child labour is widespread in the Bangladesh ready-made garment industry, existing even to some extent in export factories. The survey that workers completed for this research did not focus on child labour specifically, yet one child of 14 years was found working in an export factory. The University of Nottingham Rights Lab and Goodweave published an extensive 2024 investigation into child labour in the Bangladesh ready-made garment sector. This research found child labour was mostly used in subcontracting and informal settings,

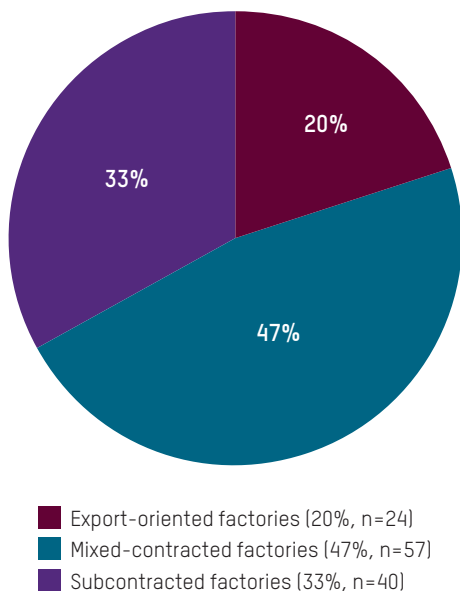
15 *Stitched with Slavery in the Seams* (Walk Free, 2023), <https://www.walkfree.org/global-slavery-index/findings/spotlights/stitched-with-slavery-in-the-seams/>.

16 Anastasiia Kliuha et al., *Modern Slavery and Child Labour in the RMG Sector of Bangladesh Report* (Goodweave, 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.

17 "Bangladesh Labour Act, 2006," accessed July 15, 2025, [https://mccibd.org/wp-content/uploads/2021/09/Bangladesh-Labour-Act-2006\\_English-Upto-2018.pdf](https://mccibd.org/wp-content/uploads/2021/09/Bangladesh-Labour-Act-2006_English-Upto-2018.pdf).

but children were also illegally employed in export-oriented factories. The research interviewed 1,974 respondents, 121 of whom were under 18, with the youngest being 10 years old<sup>18</sup>.

**Chart 1. Spread of minors by factory type**



**Our research uncovered widespread evidence of children being employed in subcontracted settings.**

In three focus groups made up of adults working in subcontracted factories, participants reported that the majority of workers in their factories were underage, with many aged between 12 and 14 years. These children are often given more work and paid significantly less than their adult counterparts. While adult workers may earn between 7,000 and 10,000 BDT (AUD \$87 – AUD \$125) per month for similar tasks, child workers typically receive only 4,000 to 5,000 BDT (AUD \$50 – AUD \$62), which is less than 25% of a living wage and less than 50% of the minimum wage. In many cases, they are required to operate two machines at once. They are not granted adequate breaks and are frequently subjected to more verbal and physical abuse than their adult co-workers.

We also conducted a focus group with seven minors employed in subcontracted factories. The group included girls aged 12 (2), 13, 15 (2) and 16 (2). All were working long hours each week and were illegally employed as child labourers. These girls also reported that children as young as seven were working alongside them in the factory.

*“Yes, boys as young as 7 – 8 years old work there, along with adults. The younger ones do helper work or cut threads. Their pay is around 6,000 to 7,000 taka. They work from 8am, and if there’s more work, until 10 or 11 at night.”*

– SUBCONTRACTING WORKER

Discussions with these child workers revealed a clear pattern of exploitation and intergenerational poverty. Due to their young age, they often lack awareness of their rights and are unable to challenge injustice. As a result, they are more vulnerable to low wages and mistreatment. When asked whether she knew that children under 18 should not be working such long hours under the law, a 16-year-old replied: “But girls get married when they are 15–16.”

All but one of the girls we interviewed expressed a wish to have continued their studies. Arfana<sup>19</sup>, who ‘chose’ to work, explained: “I had a problem ... so I had to have surgery. I couldn’t study for about a year and a half. After that, I didn’t go back to school. My parents didn’t force me either. But I chose not to return. By working, I can help at home a bit.” Arfana later clarified she began working after her mother became too ill to work.

This case highlights the impossible ‘choices’ families and children are compelled to make when faced with economic hardship. Their multiple vulnerabilities leave them highly susceptible to exploitation. In all cases, a parent’s illness was the reason the children began working. Most are employed alongside family members in the same factories, illustrating the deeply entrenched, intergenerational nature of this exploitative system.

18 Anastasiya Kliuha et al., *Modern Slavery and Child Labour in the RMG Sector of Bangladesh Report* (Goodweave, 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.

19 Name changed to protect identity.



Dhaka, Bangladesh: Mother of three, Sabana, has been working in a garment factory for nearly 10 years. She works 56 hours per week and makes 9,300 BDT (AUD \$118) per month. Photo: Fabeha Monir/Oxfam.

## CASE STUDY: Sabana\*

Sabana was married at 13, after leaving school because her parents could not afford her education. Sabana started working in a garment factory when she was only 17. She currently attaches size labels onto clothes. Sabana earns 9,300 BDT (AUD \$118) per month and works 56 hours per week.

“With this salary, it is very tough to survive and run a family,” Sabana said. “I cannot give money to my children. I cannot afford their education, my family is not running well, and we cannot eat good food.”

Sabana cannot afford to take care of all her children, so her two daughters remain in her home village and she lives in Dhaka with her son and husband. She wishes she could afford to have her daughters live with her in Dhaka, or to at least be able to take leave to visit them. She is unable to take leave even when she is sick.

“We do not want our children to suffer like us. I wish to do something good for them. I want to educate them and make them good human beings so they will not suffer like us. I don’t want my daughters to work in garment factories because I don’t want them to suffer like me.”

*\*Name changed to protect identity*



Dhaka, Bangladesh: Sabana hopes for a better life for her children. Photo: Fabeha Monir/Oxfam.

## CHILD LABOUR IN THE CHINESE GARMENT INDUSTRY

Chinese law prohibits the employment of an individual under the age of 16<sup>20</sup>. In this sense, it is very much in line with global expectations and protects children, including younger adolescents at a time when their physical and social development is paramount. Despite these protections allegedly, there is still some evidence of child labour in Chinese garment factories, with ultra-fast fashion brand Shein admitting to two cases of child labour as recently as this year<sup>21</sup>.

However, China's biggest exposure to a raft of human rights abuses, including child labour, is the cotton industry. Up to one million students, some as young as grade 3, are allegedly forced to do hard agricultural work in the annual cotton harvest<sup>22</sup> for very little if any pay, and under coercive conditions such as linking cotton picking performance to their school assessment.

## CHILD LABOUR IN THE INDIAN GARMENT INDUSTRY

The Child Labour (Prohibition and Regulation) Act, 1986<sup>23</sup> defines and sets penalties for child labour in India. It defines a child as anyone who is yet to complete their 14th year (individuals under 15). However, unlike others, this Act stops short of making parameters around how much adolescents can work. Like China, cotton farming is a major cause of concern for child labour in Indian garment supply chains<sup>24</sup>.

Children under 14 are present in the home-based or informal garment sector across India. Finishing tasks are usually carried out by home-based workers, and the use of these workers is poorly tracked or reported by the formal part of the industry. The lives of these children are heavily influenced by the caste system and harmful gender norms, with low-caste girls being the most likely to experience child labour<sup>25</sup>.

---

20 Labour Law of the Peoples Republic of China (1994). [http://www.npc.gov.cn/zgrdw/englishnpc/Law/2007-12/12/content\\_1383754.htm](http://www.npc.gov.cn/zgrdw/englishnpc/Law/2007-12/12/content_1383754.htm).

21 Sarah Butler, "Fashion Retailer Shein Finds Child Labour in Its Supply Chain," The Guardian, August 23, 2024, sec. Business, <https://www.theguardian.com/business/article/2024/aug/23/shein-fashion-retailer-child-labour-supply-chain>.

22 "List of Goods Produced by Child Labor or Forced Labor," US Department of Labor, accessed July 14, 2025, <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print>.

23 The Child Labour (Prohibition and Regulation) Act, 1986 (1986). [https://labour.gov.in/sites/default/files/act\\_2.pdf](https://labour.gov.in/sites/default/files/act_2.pdf).

24 "India: NGO Transparentem Traces Cotton Farmed under Conditions of Forced & Child Labour to Multinational Apparel Brands & Retailers," Business & Human Rights Resource Centre, accessed July 15, 2025, <https://www.business-humanrights.org/en/latest-news/india-ngo-transparentem-traces-cotton-farmed-under-conditions-of-forced-child-labour-to-multinational-apparel-brands-retailers/>.

25 Siddharth Kara, "Tainted Garments - The Exploitation of Women and Girls in India's Home-Based Garment Sector" (Berkeley: Blum Center for Developing Economies University of California, January 2016), <https://blumcenter.berkeley.edu/wp-content/uploads/2019/01/Tainted-Garments-1.pdf>.

The Sumangali Scheme is a form of forced labour in India, first emerging around 20 years ago. Named after a Tamil word meaning “happily married woman”, the scheme targets poor, lower-caste families through promises of a lump sum payment to fund their daughters’ weddings. Despite dowries being illegal since 1961, pressure to meet marriage expenses persists.

Girls aged 14 to 20 are recruited by agents and intermediaries — often through misleading advertisements — and enter contracts under the guise of voluntary consent. Once employed, they are placed under strict control, work long hours for little or no pay, and live in overcrowded, employer-provided accommodation. Contact with family is limited, and avenues for redress are minimal, exposing them to serious exploitation. Recent times have seen a concerted effort through government interventions to eliminate the scheme. However, without continued attention from Government and business there is a risk the scheme will mutate and continue to exploit female workers under new guises<sup>26</sup>. Major brands Uniqlo<sup>27</sup>, H&M<sup>28</sup>, Kmart<sup>29</sup>, Myer<sup>30</sup>, City Chic<sup>31</sup>, Ripcurl<sup>32</sup> and Macpac<sup>33</sup> all source garments from the region. Oxfam Australia is not suggesting that the supply chains of these brands are implicated in the Sumangali Scheme. Nevertheless, due to the importance of eliminating the scheme for good and its historical, widespread nature in spinning mills and ready-made garment factories, it should be reported as a modern slavery risk for these businesses. Of the brands listed, only one, Myer, mentions the Sumangali Scheme in its modern slavery statement, and even then it is referenced as a general industry risk rather than a risk identified within its own supply chain. This is not surprising given already documented concerns that companies’ modern slavery statements are poor at identifying risks present in their supply chains<sup>34</sup>.

26 “Guidance on Sumangali India,” Fair Wear, March 2015, <https://api.fairwear.org/wp-content/uploads/2020/09/Guidance-on-Sumangali-India.pdf>.

27 “UNIQLO Modern Slavery Statement,” Uniqlo, 2022, <https://modernslaveryregister.gov.au/statements/CcNhYCKfRdDrUer/pdf/>.

28 “HM Group Modern Slavery Statement 2024,” H&M, 2024, [https://hmgroup.com/wp-content/uploads/2025/03/HM-Group-Modern-slavery-statement-2024.pdf?utm\\_source=chatgpt.com](https://hmgroup.com/wp-content/uploads/2025/03/HM-Group-Modern-slavery-statement-2024.pdf?utm_source=chatgpt.com).

29 “Westfarmers Modern Slavery Statement 2023,” Westfarmers, 2023, [https://www.wesfarmers.com.au/docs/default-source/sustainability/sustainability-2023/modern-slavery-statement-2023\\_final.pdf?sfvrsn=4baee0bb\\_3](https://www.wesfarmers.com.au/docs/default-source/sustainability/sustainability-2023/modern-slavery-statement-2023_final.pdf?sfvrsn=4baee0bb_3).

30 “Myer Modern Slavery Statement 2024,” Myer, 2024, <https://investor.myer.com.au/FormBuilder/Resource/module/8Ui4A1yDKkySwNHUlaYfCQ/file/Modern-Slavery-Statement-2024.pdf>.

31 “City Chic Modern Slavery Statement,” City Chic, 2023, <https://modernslaveryregister.gov.au/statements/b1mKGyBcCq9KdAr/pdf>.

32 “Kathmandu Modern Slavery Statement,” Kathmandu, 2023, [https://kathmandu001.cdn.prismic.io/kathmandu001/1167db37-7aa1-4090-a837-ec80b0ea0dfb\\_KMD\\_ModernSlavery\\_140923\\_V5.pdf](https://kathmandu001.cdn.prismic.io/kathmandu001/1167db37-7aa1-4090-a837-ec80b0ea0dfb_KMD_ModernSlavery_140923_V5.pdf).

33 “Super Retail Group 2023 Modern Slavery Statement,” Super Retail Group, 2023, <https://media.supercheapauto.com.au/corp/files/documents/2023%20Modern%20Slaver.pdf>.

34 Freya Dinshaw et al., *Broken Promises Modern Slavery Report: Two Years of Corporate Reporting under Australia’s Modern Slavery Act* (2022), <https://www.hrc.org.au/app/uploads/2025/04/2211-Broken-Promises-Modern-Slavery-Report.pdf>.



Dhaka, Bangladesh: Nilufa Yesmin survived the Rana Plaza building collapse. Her spinal cord was fractured when she was crushed under a beam, leaving her unable to work. Photo: Fabeha Monir/Oxfam.

## 1.2 Forced labour

### FORCED LABOUR IN BANGLADESH

Forced labour is present in the Bangladesh ready-made garment sector, with Walk Free’s global slavery index estimating that up to 86% of workers in the informal garment industry meet the criteria for forced labour<sup>35</sup>. The fractured nature of the supply chain and the opaque relationship between subcontracting factories and foreign buyers makes it difficult to gain a true understanding of the extent of exposure to forced labour in the export market<sup>36</sup>. One of the most heavily publicised

and tragic examples of forced labour in Bangladesh is the Rana Plaza factory collapse. Workers, fearful for their safety due to an evacuation the previous day, and visible cracks in the building, were forced to enter the factory to work, despite their protests. Tragically, 1,134 workers were killed when the building collapsed. Subsequent interviews with workers documented that managers threatened to withhold their wages and the doors to the building were locked to prevent them from leaving<sup>37</sup>.

35 “Modern Slavery in Bangladesh - Global Slavery Index 2023 Country Study,” Walk Free, 2023, <https://cdn.walkfree.org/content/uploads/2023/11/14130724/gsi-country-study-bangladesh.pdf>.

36 Anastasiia Kliuha et al., Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report (Goodweave, 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.

37 Thaslima Begum, “A Nightmare I Couldn’t Wake up from’: Half of Rana Plaza Survivors Unable to Work 10 Years after Disaster,” Global Development, *The Guardian*, April 28, 2023, <https://www.theguardian.com/global-development/2023/apr/28/a-nightmare-i-couldnt-wake-up-from-half-of-rana-plaza-survivors-unable-to-work-10-years-after-disaster>.

The International Labour Organization identifies several indicators of forced labour that should be taken seriously, as they could signal the presence of slavery-like practices in the workplace, and in some cases could constitute a risk to human rights:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime<sup>38</sup>.

**Significant numbers of workers in our study reported experiencing forced labour**, as well as a number of the indicators identified by the International Labour Organization (see above). Specifically, these were excessive overtime, withheld wages, withheld documents and the use of fingerprints for black listing, abusive working conditions including physical, sexual and verbal abuse, and intimidation and threats. Forced labour was self-reported by 28% of workers we surveyed across export-oriented and subcontracting factories.

The Global Fund to End Modern Slavery suggested in its prevalence estimation report that rates of forced labour in subcontracting factories were as high as 86%<sup>39</sup>. Our focus groups elaborated on the ways in which workers were coerced into involuntary work through punishment. The workers we interviewed reported being harassed and intimidated to remain at work even against their will, and in circumstances of illness or emergencies. One subcontracting worker said: “A female coworker, unable to work due to illness, was almost physically assaulted by a supervisor. Instead of taking action against the supervisor, the factory fired the female worker.”

**Forced labour was universally reported in the focus group with children working in subcontracting factories. These children said they could not refuse overtime for fear their pay would be docked, and reported being scolded for going to the toilet too often.** They felt that even when they did resign, they would have to wait unreasonably long times to be paid. “If you don’t resign, they won’t pay your dues, and if you do resign, they’ll pay after five or six months,” said a 16-year-old worker with an intellectual disability in a subcontracting factory.

## **FORCED LABOUR IN THE REGION**

Cotton production is a labour intensive process with exposure to forced labour in countries across the region – these issues have been well documented by the United Nations High Commissioner on Human Rights and in Australian research such as *Paper Promises*<sup>40</sup>. *Paper Promises*, by Human Rights Law Centre (2022), also detailed harrowing tales of workers being shipped against their will to work in satellite facilities sewing clothes.

38 “ILO Indicators of Forced Labour,” ILO, October 2012, [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed\\_norm/%40declaration/documents/publication/wcms\\_203832.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_norm/%40declaration/documents/publication/wcms_203832.pdf).

39 “Forced Labor Among Informal Apparel Workers in Apparel Hubs of Bangladesh: A Prevalence Estimation Report,” Global Fund to End Modern Slavery, 2023, [https://humantraffickingsearch.org/wp-content/uploads/2023/03/22.12.14\\_Informal\\_Apparel-Prevalence-Brief.pdf](https://humantraffickingsearch.org/wp-content/uploads/2023/03/22.12.14_Informal_Apparel-Prevalence-Brief.pdf).

40 Amy Sinclair and Freya Dinshaw, *Paper Promises - Evaluating the Early Impact of Australia’s Modern Slavery Act* (2022), [https://www.hrlc.org.au/app/uploads/2025/04/Paper-Promises\\_Australia-Modern-Slavery-Act\\_7\\_FEB.pdf](https://www.hrlc.org.au/app/uploads/2025/04/Paper-Promises_Australia-Modern-Slavery-Act_7_FEB.pdf).

## 1.3 Excessive overtime

Excessive overtime, often to the detriment of the health and wellbeing of the women who make our clothes in Bangladesh, is widespread and well documented. Oxfam Australia’s past research into the lives and working conditions of the women making our clothes, *Made in Poverty – The True Price of Fashion*, found that 99% of workers in Bangladesh regularly work overtime, with some women reporting working up to 18 hours per day and suffering ongoing health issues as a result<sup>41</sup>. Six years later, this current report reconfirms excessive overtime is an ongoing issue, as 28% of respondents were forced to work overtime and 26% were unable to take leave for illness.

Although the Bangladesh law limits overtime to two hours per day, workers frequently report feeling physically exhausted and emotionally stressed. Even those not directly coerced through threats or violence often choose to exceed the legal limit simply because their wages are too low to survive on without additional income<sup>42</sup>. Working overtime is necessary just to meet basic needs and to repay loans incurred, as ordinary wages are not enough to live on, highlighting the exploitative nature of the system.

The focus groups strongly illustrate the human cost of this excessive overtime. This was perhaps most tragic for child workers, who all worked long days with only two Fridays off per month. An adult worker in a subcontracting factory observed: “Even child workers are made to work long hours. They get exhausted, but the work keeps coming.”

According to Bangladesh law, no person under the age of 18 should work more than 30 hours per week, meaning that the excessive overtime working by all of the minors interviewed by Oxfam Australia as part of the focus groups were in breach of this law.

Most of the adult workers in subcontracting factories reported working unpaid or underpaid overtime, which was not optional — refusals were met with threats of termination or wage deductions. These long, 12-hour days take a physical toll on workers, with most participants reporting health issues such as leg and back pain due to the physically demanding nature of the work. Poor lighting conditions cause eye strain, and inadequate ventilation results in extreme heat, making the work environment extremely uncomfortable.

---

41 S Nayeem Emran et al., *Made in Poverty – The True Price of Fashion* (Oxfam Australia, 2019).

42 *Improving Working Conditions in the RMG Sector Phase-II: Baseline Study Report* (ILO, 2019), [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40asia/%40ro-bangkok/%40ilo-dhaka/documents/publication/wcms\\_735614.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40asia/%40ro-bangkok/%40ilo-dhaka/documents/publication/wcms_735614.pdf).



Photo: Fabeha Monir/Oxfam.

## CASE STUDY: Fariha

Fariha, a garment worker from Mirpur 13, Dhaka, began working in factories due to financial necessity. After 12 years, the factory where she worked abruptly closed over unpaid wages. For speaking out and seeking her wages, Fariha was blacklisted through fingerprint records and labelled a troublemaker.

Now working in a subcontracted factory, Fariha is paid BDT 14,000 (AUD \$178), far below a living wage, and her pay is often delayed or split into instalments. Last month, she worked 175 hours of overtime – far beyond legal limits – when we interviewed her her pay was overdue. There are no fixed hours or proper breaks, and workers are pressured to stay late with threats of losing Saturday (overtime) pay. Abuse is widespread, and there are no grievance systems or unions to turn to.

Despite recently undergoing surgery, Fariha is still expected to endure long hours. She suffers from exhaustion, stress and despair. To cover rent, food and school fees, she has taken out a BDT 45,000 (AUD \$561) loan and repays BDT 5,000 (AUD \$62) each month, with support from her brother.

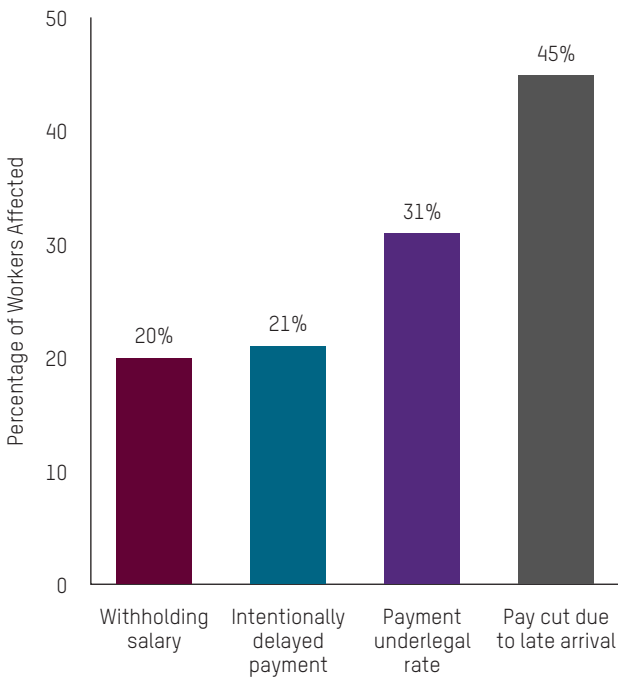
Her workplace lacks basic facilities. There is no safe drinking water, no childcare and unsanitary toilets that workers clean themselves. Girls as young as 13 are employed under exploitative conditions.

Fariha dreams of working in an export-oriented factory with maternity leave, Eid bonuses and dignity, but above all, she wants her daughters to have a better life.

## 1.4 Withheld wages

We found evidence of withholding of wages, delays to payments, and illegal and punitive deductions to wages at significant numbers of export and subcontracting factories. More than 20% of workers have experienced a deliberate delay in receiving their wages and a similar number have had their wages delayed for some time.

Chart 2. Reported issues with salary payment: factory-based workers



Goodweave (2024) found a similar pattern, noting that workers in subcontracted factories face more frequent wage delays and withholding of wages than those in factories supplying international buyers directly. However, 5% of workers in export factories had experienced one to five instances of delayed wages in the past year. Significantly, they found minors were particularly affected, with 44% reporting delayed wages in the past year and nearly one quarter of them experiencing delays five or more times<sup>43</sup>.

Focus group participants reported to Oxfam Australia's partner unfair deductions for late arrivals or incorrectly paid overtime. They also reported owners withholding pay, sometimes for months, or docking pay due to workers protesting, blaming (apparent) delays in payments on buyers or situations out of workers' control, like power cuts. Worryingly, workers in subcontracting factories reported the strategic withholding of wages, "Before Eid, they withhold money so no one can leave the job. One person said this Eid, they were supposed to get full salary and bonus by the 5th, but they gave only half."

Workers also report that protesting about their wages being withheld is futile:

---

*"[Management] don't want to pay wages, they put pressure on us with excessive work, and they want to pay less — so we are forced to protest. But when we protest, they fire us. Sometimes they shut down the factory for a few days. A few days ago, in the face of protests, two factories were shut down, and as a result, everyone lost their jobs."*

— WORKER IN SUBCONTRACTING FACTORY

---

Withheld wages present a significant issue for workers who are often already saddled with debt, living on an income far below a living wage.

<sup>43</sup> Anastasiia Kliuha et al., *Modern Slavery and Child Labour in the RMG Sector of Bangladesh Report* (Goodweave, 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.



Photo: Fabeha Monir/Oxfam.

## 1.5 Evidence of insecure work and abusive working conditions

Workers across Bangladesh's garment supply chain face abuse, and unsafe and insecure working conditions<sup>44</sup>. Our research mirrors other studies, reinforcing that job insecurity, coercive financial control, physical violence and verbal abuse permeate the industry.

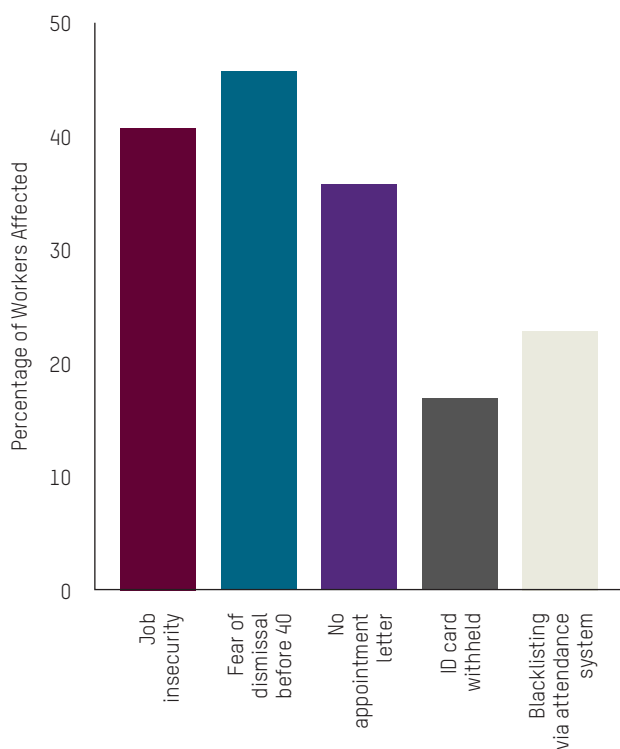
### INSECURE WORK

Insecure work in the garment sector can take many forms, including irregular, seasonal work, ageism, blacklisting, no guarantee of job security, no formal contracts and/or a lack of legal protections<sup>45</sup>.

<sup>44</sup> Anastasiia Kliuha et al., *Modern Slavery and Child Labour in the RMG Sector of Bangladesh Report* (Goodweave, 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.

<sup>45</sup> Ali Mohammad et al., *Assessment on the Socio-Economic Condition of Home-Based RMG Workers in the RMG Supply Chain: Study Report. Pdf* (Bangladesh Labour Foundation (BLF), 2025), [https://drive.google.com/file/d/1CV\\_DaMSLjCVbL3UwVlastTxN4q7LGolM/view](https://drive.google.com/file/d/1CV_DaMSLjCVbL3UwVlastTxN4q7LGolM/view).

**Chart 3. Workers' experience of insecure and informal work**



Older workers (from ages 35–40) are routinely dismissed as their physical capacity declines, and many lack formal contracts or ID documents, leaving them without legal protection. **Workers reported being fearful of being dismissed when they get too old for their body to manage the grueling conditions.** “When we get older, our hands don’t move fast enough. They say we are too slow and give our work to someone younger. One day they just told us not to come back,” said an older worker in a subcontracting factory. Age discrimination is also common for home-based workers, with one worker saying: “No-one wants to hire older workers. If we don’t earn now, what happens when our bodies can’t do the work?”

**Workers also reported significant incidents of poor formal employment documentation or provision of worker identification.** A worker representative said: “Most workers, especially in subcontracting factories, don’t get appointment letters or ID cards. This leaves them vulnerable if they’re injured or fired without cause.” Subcontracting factories rarely formalise employment, according to an assistant general manager from an export factory. “According to the

labour law, if there are fewer than 50 workers, it is not considered a factory. Taking advantage of this, they are getting the same amount or even more work done through subcontracted workers. However, when it comes to paying the minimum wage, they claim that the workers are not entitled to demand it.”

Perhaps most worryingly, almost one quarter of interviewees said fingerprint-based attendance systems were used for blacklisting. Subcontracting workers gave examples of how these systems limit their ability to find new employment. “They collect our fingerprints, and if someone complains or protests, they stop calling them. Other factories somehow know too. It’s like we are flagged.” Another worker added: “Once you’re fired, your fingerprint is marked. Other factories won’t take you. They say your record is bad, even if you did nothing wrong.”

These conditions contribute to a climate of fear and control, leaving workers especially vulnerable to exploitation and unable to claim their rights.

### ABUSIVE WORKING CONDITIONS

Workers in the garment industry face verbal, physical and sexual harassment<sup>46</sup>, with women, workers in informal employment and child workers more likely to face abuse<sup>47</sup> than their male counterparts. **Many of our focus group participants shared stories of violence, intimidation and harassment.**

Verbal abuse is commonplace, with multiple workers in subcontracting factories providing examples. “The supervisors often shout at us using very bad words. It’s humiliating, but if we protest, we are threatened with losing our job,” said one worker. “The language they use makes us feel worthless. One time I was late by five minutes, and I was told I was ‘useless like trash’,” said another.

Supervisors often use abusive language and threaten physical violence towards workers. “In our factory, the supervisor beats us if we make any mistake or fail to meet the target. We feel like prisoners,” said one subcontracting worker. Sometimes, others are drawn into the situation to perpetuate the abuse. “If someone argues or protests about the workload or wages, the manager calls security guards to beat and throw them out,” reported a subcontracting worker.

46 *Sexual Harassment and Violence against Garment Workers in Bangladesh* / ActionAid International (Action Aid, 2019), <https://actionaid.org/publications/2019/sexual-harassment-and-violence-against-garment-workers-bangladesh>.

47 Andrew Gibbs et al., “Workplace Violence in Bangladesh’s Garment Industry,” *Social Science & Medicine* 235 (August 2019): 112383, <https://doi.org/10.1016/j.socscimed.2019.112383>.



Photo: Fabeha Monir/Oxfam. \* This image is for illustrative purposes Oxfam does not suggest any of these workers are subject to modern slavery.

Even child workers are not immune from violence, with one young person saying: “If we don’t meet the target or if there’s a slight mistake, they slap us or throw clothes at us. Once I got hit with a hanger.” An adult worker said they witnessed children being targeted. “Children often cry when they are scolded or beaten, but they keep working. We feel bad for them, but we can’t do anything — we’re all afraid of losing our jobs.”

The nature of violence and harassment in garment factories is highly gendered, with women experiencing greater levels from fellow workers and supervisors: 21% of women had experienced some form of violence or harassment from male workers and 19% had experienced this at the hands of supervisors. Some of the respondents in subcontracting factories reported heartbreaking

instances of sexual harassment: “Supervisors touch women inappropriately when they pretend to adjust the dress or check stitches. You can’t say anything or you’re marked as ‘trouble’.”

---

*“Sexual harassment is unfortunately common in this sector. It includes both verbal and physical harassment. Workers face verbal harassment almost daily.” These conditions foster a climate of fear and control that prevents workers from asserting their rights or seeking justice.*

— A CIVIL SOCIETY REPRESENTATIVE

---

## CASE STUDY: Champa

Champa began working in Bangladesh's garment sector aged only 14. Forced by poverty to migrate to Dhaka with her family from a small village in Kishoreganj, Champa entered the workforce alongside her older sister to help support their parents and younger siblings. Her entry point into the industry was through a subcontracted t-shirt printing factory, producing garments destined for European markets. Though still a child, she took up physically strenuous work under unsafe, degrading and exploitative conditions.

Now working as a helper in a tin-roofed, poorly ventilated printing unit in Mirpur, Champa works with 10 to 15 other workers in a small room without proper airflow or clean drinking water, and supervisors restrict the use of fans because it may affect their work. The result is a stifling environment where workers frequently fall ill, but are denied rest, sick leave or even basic respect. Champa described how bathroom breaks are tightly controlled, with women workers like her facing humiliation and verbal abuse if they spend "too long" in the toilet or drink too much water during their shift.

From the outset, Champa endured multiple forms of abuse. Supervisors regularly shouted obscenities, insulted workers in front of others, and used sexually suggestive and demeaning language. Attempts to rest during the day were met with derision. "Why are you sitting? Are we paying you to breathe air?" one supervisor reportedly said. Complaints or protests are out of the question; Champa knows that even minor resistance could cost her the job, leaving her family without food or rent money.

She is paid far below the legal minimum wage, receiving just 6,000 to 8,000 BDT (AUD \$76 to AUD \$101) per month, depending on overtime. Even this inadequate wage is unstable. Payment is often delayed or withheld without justification, and there are no contracts, payslips, or ID cards to protect workers' rights. Champa witnessed an older male colleague have three months' wages withheld, begging his manager to release the funds so his children could eat. No one listened. He eventually left in shame, unpaid and hungry.

Despite the physical pain, psychological trauma, and constant threat of losing her job, Champa continues to work in silence, driven by the need to keep her family afloat. Champa dreams of a factory where workers are treated with dignity, paid fairly and valued as human beings — not as disposable labour.

Champa is one of thousands of child labourers trapped in Bangladesh's informal, subcontracted garment factories operating just out of sight of foreign buyers, but created by an industry that promotes low-cost and quick delivery over workers' rights and protections. Her story exposes the structural conditions that enable modern slavery: the use of child labour, the abuse of vulnerability, withholding wages and theft all underscored by the absence of grievance mechanisms, social governance and organised labour or sufficient legal protections.



# 2. DRIVERS OF MODERN SLAVERY AND EXPLOITATION

## 2.1 Workers' understanding of their rights and freedom of association

Garment workers, particularly home-based and subcontracting factory workers, have poor understanding of their rights under the law. There is low union representation and insufficient access to raise grievances and seek redress.

These conditions are made worse by a lack of accountability throughout the supply chain. While local agents and factory management are often fully aware of subcontracting practices, international brands frequently deny knowledge. According to the President, National Worker's Unity Center - Sultana Begum, "Buyers based in Bangladesh usually know, but the European ones pretend to be asleep while wide awake." Even where buyers do take action after reports of abuse, subcontracted production continues to be hidden from audits and buyer oversight, in part through falsified records and undeclared factory sites. This enables a business model that profits from informality, reinforces power imbalances, and denies workers the right to organise or assert their basic entitlements<sup>48</sup>.

Focus group participants noted that employers actively preferred hiring those who were unaware of their rights and unlikely to speak out, often turning to children for this reason. One adult worker reported: "There are many child workers here. They are very small, maybe 12 or 13 years old. They work long hours like us but get paid less." Another added: "We know it's not right for children to be working like this, but the factory hires them because they are cheap and won't protest." Workers described

a hiring culture that deliberately excluded formality and accountability. As one explained: "They prefer child workers because they don't demand anything; no ID, no appointment letter. They just work silently."

Child workers themselves were aware of why they were hired. "Small children like us are hired because we don't know much about our rights or the rules. They can scold us or make us do extra work, and we don't say anything," one child said. Another worker said, "Maybe because we're minors and won't ask for anything. We just do what they say." Another noted the fear and powerlessness that kept them silent: "They take children because we're quiet. We don't argue, and we don't ask for leave. Even if we're sick, we work because we think we'll lose the job."

**These experiences reflect a system in which workers, especially children, are systematically denied information, protection and voice, with exploitation embedded in the very structure of subcontracted production. Other groups of workers who were less likely to claim rights, such as women and those with low educational attainment<sup>49</sup> are also exploited by the system.**

In subcontracting and export-based factories, we found only 5% of workers were members of a union and only 43% of workers said they were aware of their rights. These findings reflect other studies and the industry as a whole, with union membership in export factories remaining below 8%<sup>50</sup>.

48 Martje Theuvs, "Hidden Subcontracting in the Garment Industry: Zooming in on the Role of Buying Companies," Centre for Research on Multinational Corporations, September 2015, [https://www.somo.nl/wp-content/uploads/2015/09/Hidden-subcontracting.pdf?utm\\_source=chatgpt.com](https://www.somo.nl/wp-content/uploads/2015/09/Hidden-subcontracting.pdf?utm_source=chatgpt.com).

49 Rahima Akter et al., "Gender-Based Violence and Harassment in Bangladesh's Ready-Made Garments (RMG) Industry: Exploring Workplace Well-Being Issues in Policy and Practice," *Sustainability* 16, no. 5 (2024): 5, <https://doi.org/10.3390/su16052132>.

50 Jakir Hossain and Afroza Akter, "Trade union organizing in Bangladesh's ready-made garment sector amidst COVID pandemic: Status, challenges, and scope." (Workers Resource Centre-WRC, 2022).

Chart 4. Union membership among factory-based workers

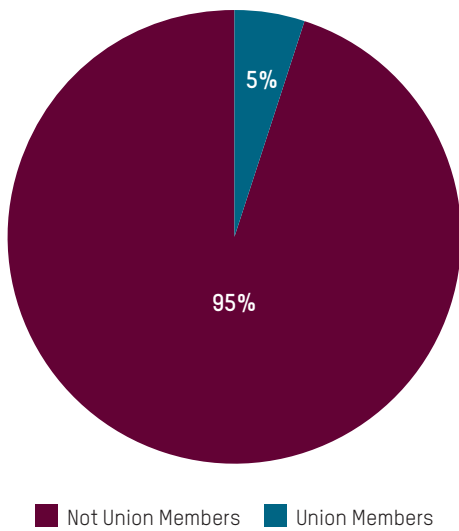


Chart 6. Gender of supervisors

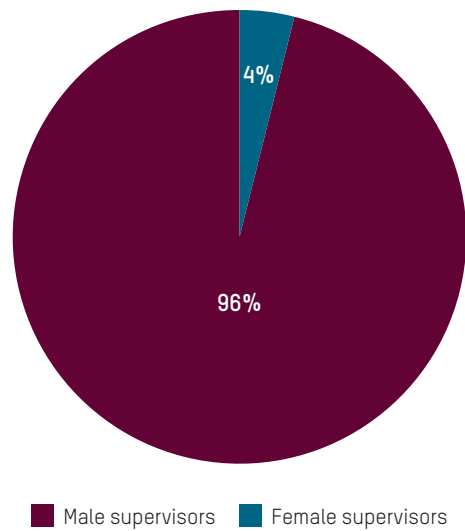
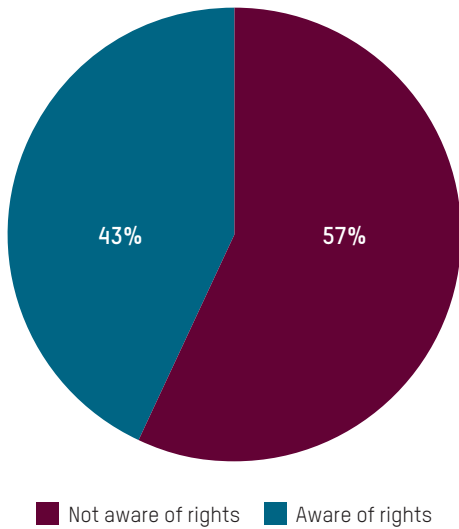
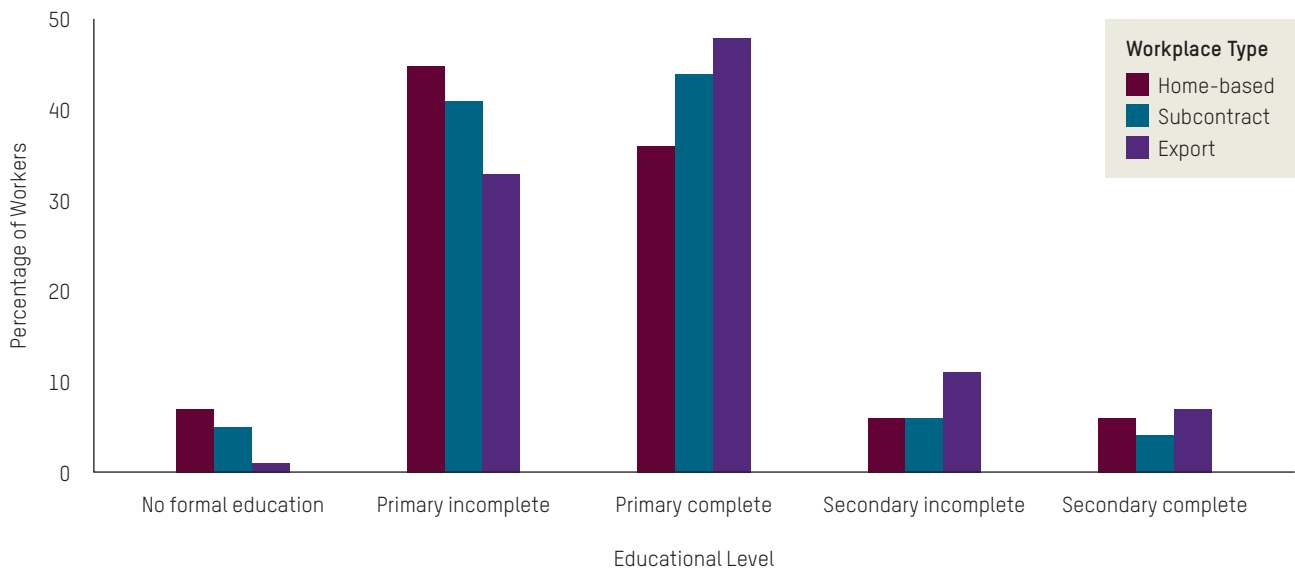


Chart 5. Workers' awareness of rights



Those with lower educational attainment and women are more concentrated in home-based and subcontracting work. Women are far less likely (only 4%) to be supervisors. This further enables an intentional business model that profits off exploitation and one that is propped up by poverty, gender imbalance, the exploitation of children and the limiting of organised labour.

Chart 7. Educational attainment by type of workplace



Limited awareness of rights is most pronounced among home-based workers, who experience extreme levels of isolation, informality and exclusion from labour protections<sup>51</sup>. Our focus group discussions in Tongi and Mirpur revealed that the majority of participants, who were all women, had no written contracts, formal recognition, or awareness of legal entitlements such as minimum wages, maternity benefits or safety protections. Most had been introduced to piecework through relatives or neighbours and were dependent on middlemen or contractors who collected finished garments and returned with new orders. As one Mirpur participant explained: “We just hand over the clothes to the person who gives us the order. We don’t know where it goes or who the final buyer is.”

The workers reported extremely low and fluctuating pay rates, with no standardisation and no power to negotiate. In Tongi, women described being paid as little as 80 to 100 BDT (about AUD \$1) per dozen pieces, while in Mirpur the rate could drop to 3 to 5 BDT (less than 10c) per piece depending on the design. Most did not consider themselves to be part of the formal garment sector and had never interacted with a union or worker organisation. One woman from Mirpur commented: “We have no one to complain to. If we don’t do the work, someone else will.” Another worker added: “We are not part of any union. We don’t know what rights we have.”

This deep informality not only limits awareness of rights but also hinders organising<sup>52</sup>. The home-based setting isolates workers from each other, and the layered subcontracting chain obscures any clear employer-employee relationship. As a result, these women operate in a space where exploitation is normalised, protections are absent, and their status as workers is entirely invisible to both government systems and international buyers.

The subcontracting agents interviewed were forthcoming, clearly stating that workers in subcontracting factories were not allowed to unionise and buyers were complicit in this arrangement.

“Unions are not allowed in subcontract factories. We don’t allow them because it causes problems. The buyers don’t ask about it, and it’s easier this way,” said one agent. This was reinforced by another agent. “If a worker tries to unionise or speak about rights, they will be blacklisted and won’t find work in this area again.”

Freedom of association is further curtailed by the fear of retaliation. Sultana Begum, President of the National Workers Unity Centre, described cases where workers staged factory occupations after months of unpaid wages, noting that they had little recourse beyond direct protest. Despite these desperate efforts, the lack of documentation means many are excluded from official wage claims, legal protections and workplace audits. Workers are often paid per piece, denied minimum wage protections, and employed under conditions that prevent any kind of sustained organising or union representation.

---

*“The more rights are taken away, the higher the profit margin becomes. ... Then comes the coercion, and finally the ruthless exploitation, with zero safety net. No paid sick leave. No job protection. If you fall sick? Go home, no pay. If you ask for leave, your wage is docked. So workers start believing that illness is a weakness, absence is a crime, and asking for leave is like stealing from themselves. That’s how the system traps people — not just economically, but mentally. We often talk about bonded labour, but this is voluntary bondage — people are tricked into thinking they chose this.”*

– RAZEKUZZAMAN RATAN OF THE SOCIALIST LABOUR FRONT

---

It is clear that workers across the garment industry, especially in subcontracting factories and home-based settings, face severe barriers to understanding and exercising their rights due to low education levels, lack of union representation, and deliberate suppression by employers, resulting in a system that profits from informality, disempowerment, and the exploitation of vulnerable groups, particularly women and children.

---

51 ILO-MAMPU Project, *Home-Based Workers: Decent Work and Social Protection through Organization and Empowerment - Experiences, Good Practices and Lessons from Home-Based Workers and Their Organizations* (ILO, 2015), <https://www.ilo.org/publications/home-based-workers-decent-work-and-social-protection-through-organization>.

52 “Home Based Workers Sector Summary,” *Women in Informal Employment: Globalizing and Organizing*, 2019, <https://www.wiego.org/wp-content/uploads/2019/09/WIEGO-Home-Based-Workers-Sector.pdf>.



Dhaka, Bangladesh: Garment worker Sabina, at home. Photo: Fabeha Monir/Oxfam.

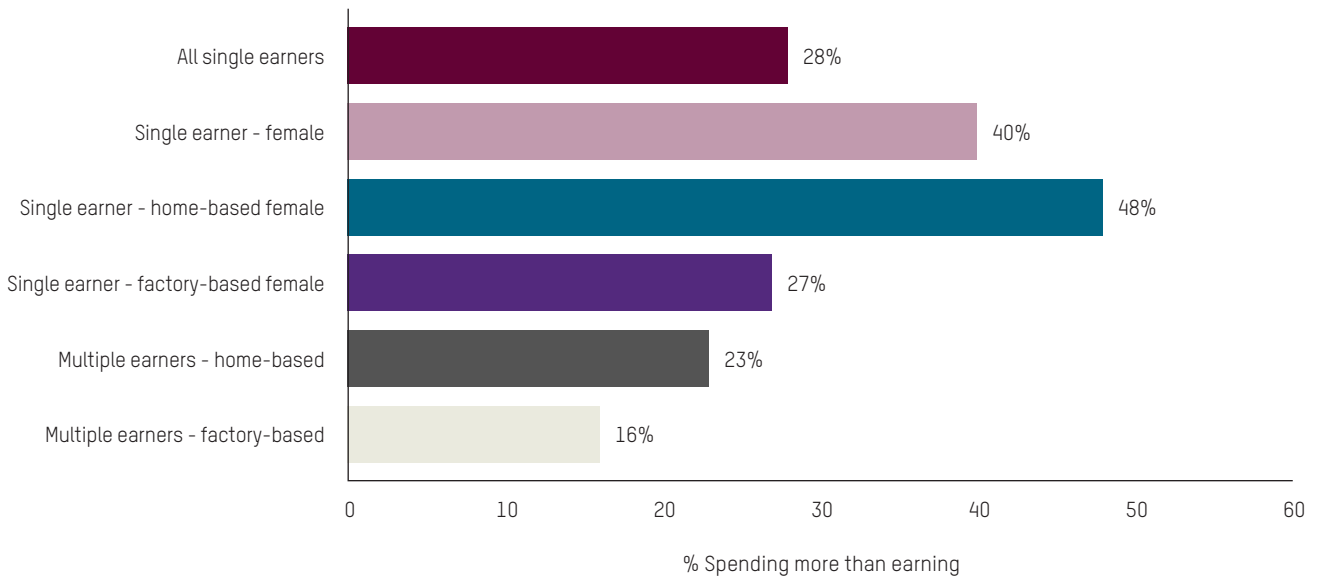
## 2.2 Poverty wages

Oxfam Australia's groundbreaking 2019 research into wages and exploitation in the fashion industry, *Made in Poverty – The true price of fashion*, found the women who make our clothes are trapped in a cycle of exploitation. The wages paid are so low that workers cannot afford the necessities to live and are vulnerable to exploitation in their workplace<sup>53</sup>. *Made in Poverty* found that 100% of those interviewed in Bangladesh were paid less than a living wage.

Six years later, we have found consistent results, with 95% of workers in Bangladesh garment factories earning below a living wage, rising to 100% if only considering women (as some male supervisors who earn more were included in this data set). Not only are almost all workers paid below a living wage, 61% of focus group participants who shared their monthly wage earned below the minimum wage.

<sup>53</sup> S Nayeem Emran et al., *Made in Poverty – The True Price of Fashion* (Oxfam Australia, 2019).

**Chart 8. Percentage of workers whose expenses exceed income by household type**

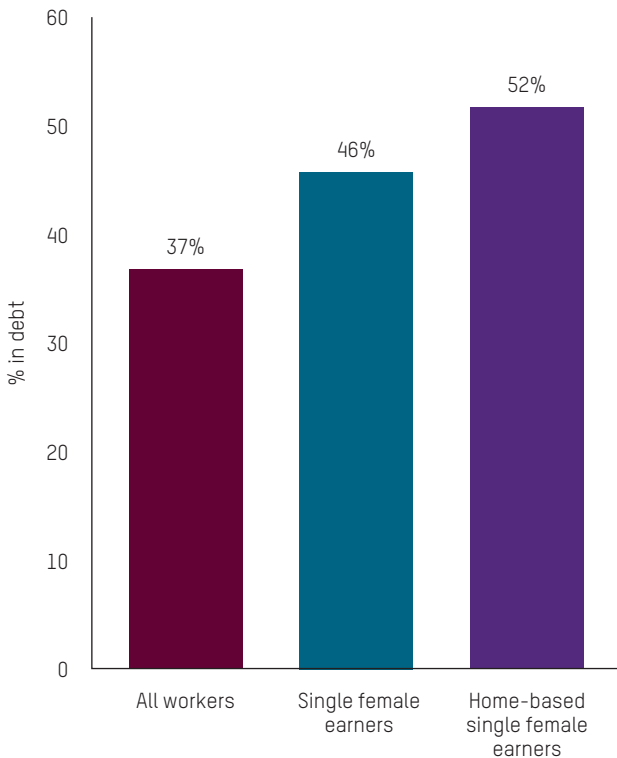


These low wages have massive impacts on the lives of workers, with many reporting that their living expenses regularly exceed their income.

This shortfall results in workers taking on debt to make ends meet, placing households at risk of greater financial vulnerability. One subcontracting worker told us: “When I didn’t get paid on time, I took

small loans — 300 or 500 taka — from multiple people. Then the cycle continues.” Home-based workers, the lowest paid group, are in a perilous situation, regularly borrowing money to pay for essentials like food and rent. As shared by a home-based worker: “If the child gets sick, we borrow from neighbours. We have no savings.”

**Chart 9. Percentage of workers in debt by group**



All focus group participants reported harrowing tales of need, many not being able to afford basic medical care or food for their children. “We work all day and barely make enough to feed our family. After buying rice and lentils, there’s nothing left,” said one home-based worker. Workers talk about how they go without food so their children can eat: “When the factory was late paying us again, I fed the kids first. I didn’t eat anything for two days. I borrowed [money] for oil and potatoes,” said a contractual worker in a subcontracted factory.

*“After working all day, I earn less than 200 BDT (AUD \$2.50). That’s not enough to run a family.”*

– HOME-BASED WORKER

This deliberate, entrenched system of poverty wages keeps workers living in poverty and leads directly to their further exploitation. These poverty wages trap workers, especially women, in cycles of debt, food insecurity and dependence on informal borrowing just to meet basic needs. This also contributes to the intergenerational nature of exploitation we see in the employment of child workers.

**Finally, poverty wages trap workers in jobs where their human rights are routinely violated and placed at risk. Our focus groups revealed that workers endured mistreatment, poverty wages, and unsafe conditions not only due to fear of blacklisting or intimidation, but also because of the lack of alternative employment and their deeply precarious circumstances. With no savings to fall back on, even a brief interruption in work was unaffordable as they were already earning too little to survive.**

These dire circumstances were summed up by one child worker: “We don’t get paid on time. Sometimes we don’t get paid at all. But we wait. We beg. We borrow. We keep working because we need it.”

## 2.3 Poor purchasing practices and the use of subcontractors

Subcontracting, including unauthorised subcontractors, is a persistent feature of global garment supply chains. In recent years, media attention has highlighted its prevalence in the Chinese industry, particularly among controversial ultra-fast fashion brands such as Shein<sup>54</sup>. In the Indian market, use of home-based workers within subcontracting structures is widespread, resulting in extremely low wages and illegal child labour<sup>55</sup>. In Bangladesh’s garment industry, subcontracting factories and home-based workers are also common, making up a significant portion of the overall supply chain and providing structural support to the whole industry, including export factories, enabling them to maintain production volume during peak times<sup>56</sup>.

All participants interviewed for this research, including workers, suppliers, subcontracting agents and union officials, reported a growing trend toward the use of contractors, including unauthorised subcontractors. According to one subcontracting agent: “Buyers now want shipments quickly after placing orders, so when main factories can’t meet the deadline, they get it done through us.” This shift is driven by evolving industry demands for quicker turnaround times and increased expectations from buyers.

Subcontracting is watched closely by a number of trade union leaders, who have in-depth knowledge of the system and history of how it became so entrenched. “Subcontracting in its true sense began when the scope of this work expanded, when export volumes increased, and the scale of production grew. I’d say more than 20–25% of the work is happening through subcontracting,” said Razekuzzaman Ratan, a trade union leader. Ratan described the hidden nature of the system: “It’s a system built on invisibility. Subcontractors don’t show up in the official supply chain, but they’re the ones producing a significant portion of garments for export. That’s how rights are evaded.” As one civil society representative said: “Subcontracting is widespread. Orders go from the main factory to another, then to a third, and even to home-based settings. These layers make it hard to trace the origin of a garment or hold anyone responsible.”

Subcontracting is deeply embedded in the structure of global garment supply chains and plays a significant role in perpetuating human rights abuses, including the payment of poverty wages. While subcontracting can serve a functional purpose, enabling factories to meet tight deadlines or cope with overflow orders, it often functions as a tool for risk transfer: shifting labour rights violations further down the supply chain. Trade union leader Sultana Begum explains how blame is shifted down the supply chain: “If an accident happens, the buyer tries to deny responsibility, and so does the factory owner.” Another union leader went on to note: “If something happens to a subcontracted worker, if they die on the job, there is no record. The brands won’t even know their name.”

54 Sixth Tone, “The Shady Labor Practices Underpinning Shein’s Global Fashion Empire,” #SixthTone, September 17, 2021, <https://www.sixthtone.com/news/1008472>.

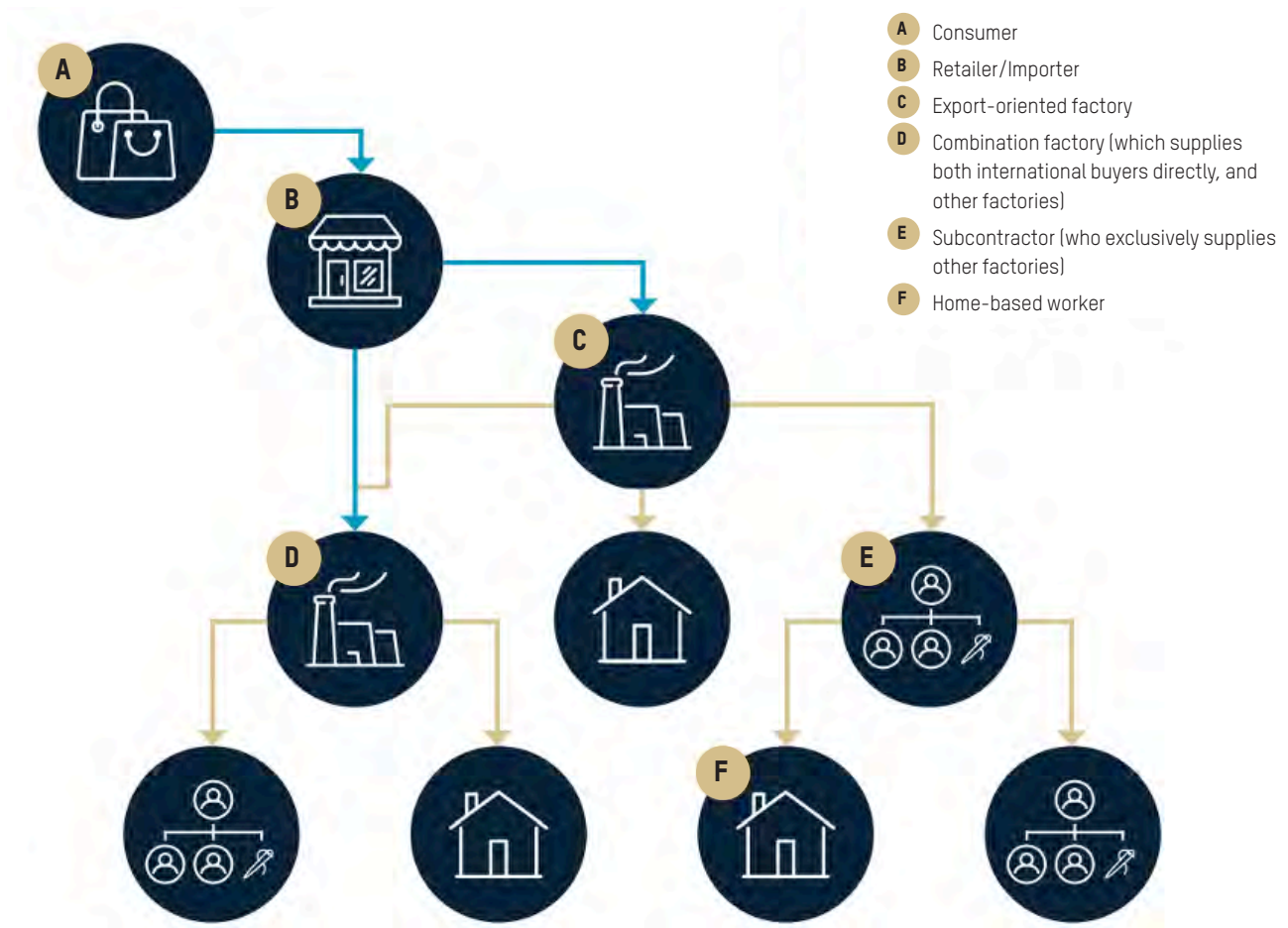
55 Siddharth Kara, *Tainted Garments - The Exploitation of Women and Girls in India’s Home-Based Garment Sector* (Blum Center for Developing Economies University of California, 2016), <https://blumcenter.berkeley.edu/wp-content/uploads/2019/01/Tainted-Garments-1.pdf>.

56 Vijay Padmanabhan, Dorothée Baumann-Pauly, Sarah Labowitz, *The Hidden Price of Low Cost: Subcontracting In Bangladesh’s Garment Industry*, 2015. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2659202](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2659202)

Workers in subcontracting factories are more likely to be child labourers, endure forced labour, have their wages withheld, be verbally or physically abused, lack proper documentation, and work under the constant threat of losing their job. They are also less likely to be part of a union or to be aware of their rights<sup>57</sup>.

Home-based workers face many of the same issues, working for astonishingly low wages that may be arbitrarily withheld, without any formal relationship to an employer, legal protections or union representation<sup>58</sup>.

**Diagram 1: Subcontracting through factories and home-based workers is a key feature of Bangladesh’s garment supply chain, propping up large export factories and allowing them to meet output targets at the expense of workers’ rights.**



Source: Goodweave 2025.

Note: Often it is only the blue relationship lines which are visible to buyers, with subcontracting of any kind remaining undisclosed or inaccessible.”

57 Anastasiia Kliuha et al., *Modern Slavery and Child Labour in the RMG Sector of Bangladesh Report* (Goodweave, 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.

58 Anastasiia Kliuha et al., *Modern Slavery and Child Labour in the RMG Sector of Bangladesh Report* (Goodweave, 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.



Dhaka, Bangladesh: Home-based worker Laily started working in a garment factory when she was just 12 years old. Photo: Fabeha Monir/Oxfam.

Multiple key informants and worker testimonies suggest that foreign buyers play a critical role in sustaining this system. As a senior human resources manager at a major exporting factory explained, subcontracting typically occurs when a factory accepts more orders than it can fulfil in-house, often in response to unrealistic production timelines or last-minute changes from international clients. “When shipment dates are tight, we pass the work to subcontracted factories,” he said. While some buyers formally prohibit subcontracting or require subcontractors to meet certification standards such as WRAP or BSCI<sup>59</sup>, enforcement is inconsistent<sup>60</sup>. In many cases, buyers either look the other way or rely on local agents to manage relationships, creating layers of distance and plausible deniability. As a trade union leader observed, even upper management in large factories may lack accountability on the use of subcontracting factories: “From my personal experience, owners of big factories in Bangladesh ... don’t have time to take these small decisions. They may know subcontracting happens somewhere but not in detail.”

**It is very difficult to find a ‘smoking gun’ and directly link clothes produced via subcontracting to export markets. Oxfam Australia suggests this is by design, with deliberate practices such as not attaching brand name labels and using intermediary agents being common practice.** But when we asked workers, they were clearly under the impression that their work was bound for export markets.

As one worker explained: “We do not supply for the local market. The goods we produce are supplied to the main factories. The goods are then exported by the main factories.” Another added: “Our factory does not export directly. But the goods we make are sent to bigger factories that work with international buyers.” In some cases, workers understood their factories were involved in earlier stages of production: “Some products that are exported are partly made in factories like ours, but only the finishing or labelling is done at the main factory.”

Even child workers shared this awareness, with one child reporting: “We work in the factory to make export clothes. These clothes go abroad. We know this because the supervisor tells us which country the clothes are going to.” Another explained: “Sometimes they say this order is urgent, the buyer

is from Germany or the UK, so we must finish it quickly.” While direct contact with international buyers was rare, it was not unheard of: “We don’t see any foreign people, but we hear their names. The factory owner deals with them.” One child worker noted: “Yes, sometimes. Foreigners come too, to check if the work is done properly.”

Home-based workers described similar experiences: “We don’t know the exact brand or buyer, but they say the clothes go abroad — maybe to America or England. They never tell us the name.” Another shared: “They say, ‘this is an order for outside the country’, and we have to finish quickly.”

Despite this ‘open secret’, buyers frequently fail to take responsibility for labour conditions beyond their first-tier suppliers and therefore sufficiently reduce risks to human rights. These first-tier suppliers may be one of many compliant export factories with safe and comfortable working conditions, legal pay and access to grievance mechanisms that accord with the ethical sourcing policies of international brands. However, these arrangements are routinely under threat of being undermined by purchasing practices that incentivise speed, flexibility and cost-cutting over workers’ rights. As union leader Razekuzzaman Ratan said: “The more [informal work] you introduce, the more child labour you use, the more women you employ in vulnerable conditions — these all become tools to make work cheaper. So we believe that it’s not accurate to say buyers are unaware. Rather, they often ignore the responsibilities they do have.”

**It is clear that voluntary codes of conduct and buyer-led audits are insufficient to protect workers. Introducing mandatory human rights and environmental due diligence legislation and import bans in Australia would help close these gaps by requiring companies to trace and address risks throughout their entire supply chain, including in unauthorised subcontracting and home-based work. This legal obligation would move beyond voluntary compliance, ensuring that brands doing business in Australia are accountable for the real conditions under which their goods are produced.**

59 WRAP (Worldwide Responsible Accredited Production) is a certification program specifically for the apparel, footwear, and sewn products industry, while BSCI (Business Social Compliance Initiative) is a broader, membership-based system focused on improving working conditions across various industries

60 Felipe Caro and Leonard Lane, “Can Brands Claim Ignorance? Unauthorized Subcontracting in Apparel Supply Chains,” *Management Science*, April 2021.



Dhaka, Bangladesh: Shaila, a home-based worker, inside her house. Photo: Fabeha Monir/Oxfam.

## CASE STUDY: Shaila\* – Home-based worker

Shaila started working in the garment industry when she was 11 years old to support her family through financial difficulties.

“I told my mother that I wouldn’t say I liked the garment [factory], I could not drink water, there was dust, dirt, and many problems, and I did not want to go. Mother forcefully took me to the gate and told me, “Please go. What else can you do? How will you continue? Your father is sick now. If you had an elder brother, he could help.”

While working at the factory she experienced verbal and physical abuse as she struggled to keep up with the work load.

“I left because they used to abuse me verbally and beat me. They never understood that I got sick. They used to push me on my neck to make me work. I was forced to work. Like this, they tortured me in many ways, so I left the job, they scolded me also.”

At 14, Shaila got married but soon afterwards, while she was pregnant, her husband left her. Shaila was no longer able to work in the factory as she had to take care of her son. She was allowed to start working from home, and she has been a home-based worker for the past 14 years.

*\*Name changed to protect identity*



Dhaka, Bangladesh: Shaila with her son. Photo: Fabeha Monir/Oxfam.

Shaila's wage is not sufficient to live on and she often struggles to afford the basic necessities. Shaila often needs to work late into the night and sometimes needs to take on debt just to survive.

---

*"I have got extra work because I cannot bear the expenses, my body cannot tolerate [the work] but I must live. I suffer a lot because I work at night. People sleep at night, but I do not rest as I work at night. As expenses increased, I could not bear these."*

---



# 3. AUSTRALIA'S EXPOSURE

Only 3% of clothes produced by Australian brands are made in Australia<sup>61</sup>. **Australia's globalised supply chains leave the country highly exposed to the risk of modern slavery, particularly within the global ready-made garment industry. The vast majority of clothing worn by Australians is manufactured overseas, meaning Australia's fashion industry is deeply reliant on international supply chains where exploitation is widespread.** According to the World Bank<sup>62</sup>, in 2022 Australia's textile and clothing imports were sourced from:

- China: 57.87%
- Bangladesh: 7.84%
- India: 6.11 %
- Vietnam: 4.92%
- Indonesia: 2.48%
- Other countries: 20.72%

Clothing retailing in Australia is big business with an expected revenue of \$28.1 billion in 2024–2025<sup>63</sup>. The CEOs at the top of these businesses are making huge amounts of money off the back of paying poverty wages. Businesses fail to implement responsible purchasing practices sufficient to curtail unauthorised subcontracting.

Globally, Australians are the biggest per capita consumers of fashion, buying an average of 56 new clothing items a year, more than the US (53 items), UK (33 items) and China (30 items)<sup>64</sup>. Despite this massive consumption, or perhaps because of it, Australians care about an ethical fashion industry. A 2023 YouGov poll commissioned by Oxfam Australia found that 55% of Australian clothes buyers consider ethics when shopping, with 73% concerned about how little overseas garment workers are paid. Of these consumers, 71% believe brands exaggerate or mislead consumers about worker treatment in their supply chains. Perhaps most importantly for this report, 82% of respondents support stronger government regulation to ensure fair wages, showing public demand for action beyond brand promises. Given our global exposure and (over) consumption of fashion, and public support for government regulation, the Australian Government must urgently advance the introduction of a new law that holds companies accountable for harm they cause to people and the planet, to prevent harms, promote living wages and decent work, and protect the environment that sustains us all.

61 Adelaide Miller, "Brands See Demand for Australian-Made Clothes but 'Very Little Capability'," *ABC News*, May 29, 2025, <https://www.abc.net.au/news/2025-05-30/push-to-bring-fashion-manufacturing-back-to-australia/105338638>.

62 World Intergrated Trade Solution, "Australia Textiles and Clothing Imports by Country in US\$ Thousand 2022," October 6, 2025, [https://wits.worldbank.org/CountryProfile/en/Country/AUS/Year/LTST/TradeFlow/Import/Partner/by-country/Product/50-63\\_TextCloth](https://wits.worldbank.org/CountryProfile/en/Country/AUS/Year/LTST/TradeFlow/Import/Partner/by-country/Product/50-63_TextCloth).

63 IBIS World, Retail Trade-64251, Clothing Retailing in Australia, May 2025, Kayla Wheeler

64 Chris Redman, "Australians Revealed as World's Biggest Fashion Consumers, Fuelling Waste Crisis," *The Australia Institute*, May 28, 2024, <https://australiainstitute.org.au/post/australians-revealed-as-worlds-biggest-fashion-consumers-fuelling-waste-crisis/>.



# 4. THE CURRENT LEGISLATIVE FRAMEWORK AND KEY REFORMS

## AUSTRALIA'S MODERN SLAVERY FRAMEWORK NEEDS AN URGENT REFRESH

We are all connected through the clothes we wear, the food we eat, and the technologies we rely on. Despite this, Australia's legal framework for addressing exploitative working conditions in our global supply chains is not strong enough to drive the meaningful change that is needed to effectively tackle the drivers of modern slavery.

## REPORTING ALONE IS NOT THE SOLUTION

In 2018, Australia passed the Modern Slavery Act, a transparency-based regime aimed at encouraging business-led responses to modern slavery<sup>65</sup>. Under section 16 of the Modern Slavery Act, large entities are required to prepare statements that identify modern slavery risks in their operations and supply chains, actions taken to assess and address modern slavery risks (including due diligence and remediation), the effectiveness of such actions, and the process of consultation with entities owned or controlled by the business. Currently, there are no hard consequences for failing to take action to address modern slavery, and reporting entities face no penalties for failing to comply with reporting requirements.

While the Modern Slavery Act was intended to drive a 'race to the top' by businesses to take proactive and effective actions to

address modern slavery, compliance with the mandatory reporting criteria has been patchy<sup>66</sup> and, with a few notable exceptions, the quality of reporting in many companies' statements has been poor. Research has shown that many companies have failed to identify obvious modern slavery risks in their supply chains or taken meaningful action to address them<sup>67</sup>. Of particular concern is the fact that the legislation does not appear to be driving changes in the areas that matter most for tackling modern slavery, such as efforts to address recruitment fees or undertake due diligence on suppliers, pay a living wage for workers, improve purchasing practices, or lift supply chain working conditions.

In 2022–2023, an independent statutory review of the Modern Slavery Act was conducted by Professor John McMillan AO. The final report acknowledged widespread views that, "there is no hard evidence that the Act has caused meaningful change for people living in conditions of modern slavery"<sup>68</sup>. It made 30 recommendations to strengthen the Act, including the introduction of a modern slavery due diligence obligations and penalties for companies that fail to comply.

While the Australian Government has now appointed a Federal Anti-Slavery Commissioner<sup>69</sup> and committed to further improving the Act, including by introducing

65 Modern Slavery Act 2018 (2018). <https://www.legislation.gov.au/C2018A00153/latest>.

66 The Australian Government has assessed 25% of statements as non-compliant: see Attorney General's Department, *Strengthening the Modern Slavery Act* (Consultation Paper, July 2025), p 26, [https://consultations.ag.gov.au/crime/modern-slavery-act/user\\_uploads/consultation-paper-strengthening-the-modern-slavery-act.pdf](https://consultations.ag.gov.au/crime/modern-slavery-act/user_uploads/consultation-paper-strengthening-the-modern-slavery-act.pdf).

67 Freya Dinshaw et al., *Broken Promises Modern Slavery Report: Two Years of Corporate Reporting under Australia's Modern Slavery Act* (2022), <https://www.hrlc.org.au/app/uploads/2025/04/2211-Broken-Promises-Modern-Slavery-Report.pdf>.

68 John McMillan, *Report of the Statutory Review of the Modern Slavery Act 2018 (Cth) The First Three Years* (2018), <https://www.ag.gov.au/sites/default/files/2023-05/Report%20-%20Statutory%20Review%20of%20the%20Modern%20Slavery%20Act%202018.PDF>.

69 Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023 – Parliament of Australia (2023). [https://www.aph.gov.au/Parliamentary\\_Business/Bills\\_Legislation/Bills\\_Search\\_Results/Result?bid=r7122](https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bid=r7122)

penalties<sup>70</sup>, there has been slow progress on reforming the Act in the two years since the review took place. Even if the Modern Slavery Act is reformed to include penalties, simply enforcing better reporting will not drive the transformational changes to corporate practices that are needed to help end reliance on modern slavery.

## CHALLENGES WITH THE CRIMINAL CODE

Australia has criminalised forced labour and the worst forms of child labour under the Criminal Code<sup>71</sup>. While there are serious criminal offences for engaging in or benefiting from forced labour, to date there have been no known prosecutions of Australian companies in relation to forced labour in their global supply chains. This reflects broader and well-documented enforcement challenges, including difficulties obtaining evidence across jurisdictions, the complexity of attributing liability to corporate entities, and the absence of specific offences that hold companies accountable for failing to prevent modern slavery<sup>72</sup>.

As a result, Australian laws continue to fall short in providing an effective deterrent to corporate involvement in serious human rights abuses occurring offshore. Further, while laws can provide an important form of accountability in the most serious cases, other regulation is needed to incentivise businesses to improve prevention of exploitation across the board.

## CHANGE IS POSSIBLE: A BETTER FUTURE FOR WOMEN WHO MAKE OUR CLOTHES IS WITHIN REACH

Australia can and should do more. In Europe<sup>73</sup>, Canada<sup>74</sup>, the United States and the United Kingdom<sup>75</sup>, expectations are evolving for businesses to take concrete action to identify, prevent and mitigate harm to supply chain workers. This includes legislating bans on goods produced with forced labour, as well as the emergence of mandatory human rights due

diligence laws. To secure a future where workers around the world who help make the goods that we consume are paid a decent wage and live in freedom and dignity, Australia must urgently strengthen its legal framework for addressing modern slavery<sup>76</sup>.

First, **Australia must amend the Modern Slavery Act to require companies to undertake ‘human rights due diligence’ to address modern slavery.**

In particular, the Modern Slavery Act should be strengthened by introducing a clear legal duty on companies to take action to prevent modern slavery. This would mean that businesses must take reasonable steps to identify and address risks of forced and child labour and exploitation in their operations and supply chains and face consequences if they fail to do so. This change would give workers and communities a way to seek justice when companies turn a blind eye, and help ensure that companies already doing the right thing are not undercut by those that ignore abuse.

Second, **Australia must urgently take concrete steps to introduce comprehensive responsible business laws that require large companies to undertake human rights and environmental due diligence.**

We all want to live and work in thriving communities, where we can live well, enjoy fair and dignified work and build a better future for our families and generations to come. That’s why we need rules that require big corporations to listen to workers and communities, involve them in decision-making, prevent harms before they occur, including by ensuring a living wage for all supply chain workers, and fix any damage they cause.

Australia must urgently advance the introduction of a new law that holds companies accountable for harm they cause to people and the planet, with the aim of either complementing or ultimately superseding the Modern Slavery Act by the time of its next statutory

70 “Australian Government Response to the Review Report of the Modern Slavery Act 2018 (Cth) | Attorney-General’s Department,” December 2, 2024, <https://www.ag.gov.au/crime/publications/australian-government-response-review-report-modern-slavery-act-2018-cth>.

71 Criminal Code Act 1995 (1995). <https://www.legislation.gov.au/C2004A04868/latest>.

72 *Corporate Criminal Responsibility: Final Report* (Australian Law Reform Commission, 2020).

73 Directive - EU - 2024/1760 - EN - EUR-Lex (2024). <https://eur-lex.europa.eu/eli/dir/2024/1760/oj/eng>.

74 Consolidated Federal Laws of Canada, Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024). <https://laws.justice.gc.ca/eng/acts/F-10.6/>.

75 See Great British Energy Bill 2025 (UK), cl 3; see also Department for Energy Security and Net Zero, Great British Energy to lead the field in ethical supply chains (23 April 2025). <https://www.gov.uk/government/news/great-british-energy-to-lead-the-field-in-ethical-supply-chains#:~:text=A%20new%20measure%20set%20out,global%20leader%20in%20clean%20energy>; UK Government, *The UK’s Trade Strategy* (June 2025), 88, [https://assets.publishing.service.gov.uk/media/685c17d24cd6b0316870984b/uk\\_trade\\_strategy\\_print.pdf](https://assets.publishing.service.gov.uk/media/685c17d24cd6b0316870984b/uk_trade_strategy_print.pdf).

76 It is noted that the United Kingdom Government has recently committed to undertaking a multistakeholder review of its approach to ensuring responsible business conduct, focusing on the global supply chains of businesses operating in the UK. Australia could establish a similar inquiry and work with the UK and other Commonwealth countries such as Canada to advance these reforms in a coordinated manner across jurisdictions.

review. This would involve formally committing to, and consulting on, the establishment of a human rights and environmental due diligence regime in order to holistically address the drivers of modern slavery.

Requiring companies to undertake due diligence is consistent with Australia's international obligations to protect against human rights abuses by business enterprises within its territory or jurisdiction<sup>77</sup> and to suppress all forms of forced labour<sup>78</sup>. The Protocol to the Forced Labour Convention requires states, including Australia, to take effective measures to prevent and eliminate forced labour, including by providing workers with effective remedies, sanctioning perpetrators, addressing root causes of forced labour and supporting due diligence by public and private actors. Australia has also ratified

the Convention on the Rights of the Child, which recognises the right for children to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with their education, or harm their health or physical, mental, spiritual, moral or social development<sup>79</sup>.

Due diligence laws to prevent human rights violations in corporate supply chains have already been introduced in France, Germany, Norway and the European Union. In particular, the European Union Corporate Sustainability Due Diligence Directive introduces a human rights due diligence regime for large businesses and is expected to capture some of Australia's largest companies, as well as increasing scrutiny of Australian businesses in the supply chains of European Union companies.



Dhaka, Bangladesh: Kalpona is the founder of the Bangladesh Centre for Workers Solidarity  
Photo: Fabeha Mohir/Oxfam.

*“The mandatory due diligence directive ... the one that European Union just imposed, then yes [it will help workers], if we have that because that has included the living wage, that has included occupational safety and how in a broader perspective, not like, you know, the electrical, fire and structural. So, if we have that law, and if that is mandatory, if it is contributory improvement, and if we rights holders have access to justice or access to remedy, then yes, that will transform whole supply chain.”*

– KALPONA AKTER, LABOUR ACTIVIST, FOUNDER OF THE BANGLADESH CENTRE FOR WORKERS SOLIDARITY, AND FORMER CHILD WORKER.

77 *Guiding Principles on Business and Human Rights, Implementing the United Nations “Protect, Respect and Remedy” Framework* (United Nations, 2011).

78 “International Covenant on Civil and Political Rights,” OHCHR, accessed July 29, 2025, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>.

79 “Convention on the Rights of the Child,” OHCHR, accessed July 29, 2025, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>.

The requirement for businesses to exercise due diligence over their supply chains is not novel or unique. Due diligence obligations are already found in Australian laws on other responsible business conduct issues, such as health and safety, anti-money laundering, corruption, illegal logging and sexual harassment<sup>80</sup>. The Modern Slavery Act Review also noted there is a “growing international conviction – a global norm – that due diligence processes must be the core strategy for addressing human rights abuses and modern slavery practices ... in corporate supply chains”.

From living wages to sexual harassment, freedom of association to access to water, food and housing, we know that the drivers of modern slavery are deeply intertwined. Focusing narrowly on modern slavery will not be enough to turn around the deep, growing exploitative practices that occur in Australia’s supply chains. A mandatory human rights and environmental due diligence law is the critical next step that must be taken to eliminate Australia’s supply chain links with forced labour.

**Third, Australia must establish an import ban on goods made with forced labour.**

Australia risks becoming a dumping ground for goods made with forced labour if it continues to allow high-risk imports, made using forced labour, to cross the border. We should follow the lead of the European Union and the United States and establish an evidence-based regime that puts the onus back on companies to prove their goods are free from exploitation<sup>81</sup>.

An import ban has the potential to greatly enhance Australia’s response to modern slavery, as a complementary mechanism to the establishment of due diligence laws to help ensure Australian businesses are not profiting from or contributing to slavery, and to protect workers’ rights. In 2021, the Australian Senate inquiry into the Customs Amendment (Banning Goods Produced By Uyghur Forced Labour) Bill 2020 made several unanimous recommendations in favour of establishing a broad-based global forced labour import ban modelled on the US Tariff Act. These recommendations provide a strong foundation for next steps on advancing this necessary reform. Importantly, remediation to impacted workers must be a fundamental aspect embedded into the regime so that companies are incentivised to lift working conditions across garment factories and other high-risk industries over turning a blind eye to exploitation.

If goods made with forced labour were subject to a comprehensive import ban regime, this could mean that shipments from factories with reasonable evidence of forced labour would be blocked from entry into Australia until the Australian Border Force was satisfied that any forced labour indicators in those factories had been remedied. As a result, Australian companies would face real operational and commercial consequences for failing to address modern slavery in their supply chains. Crucially, the requirement for remediation should also provide a powerful means through which working conditions on the ground could be substantially improved for the women who make our clothes.

---

80 John McMillan, *Report of the Statutory Review of the Modern Slavery Act 2018 (Cth) The First Three Years* (2018), <https://www.ag.gov.au/sites/default/files/2023-05/Report%20-%20Statutory%20Review%20of%20the%20Modern%20Slavery%20Act%202018.PDF>.

81 Regulation - EU - 2024/3015 - EN - EUR-Lex. Accessed July 29, 2025. <https://eur-lex.europa.eu/eli/reg/2024/3015/oj/eng>.



Dhaka, Bangladesh: Laily\* a home-based garment worker with her young son. Photo: Fabeha Monir/Oxfam.  
\*Name changed to protect identity.

## 5. WHAT MIGHT DUE DILIGENCE LOOK LIKE IN THE FASHION INDUSTRY?

All companies undertaking human rights due diligence should develop a stand-alone human rights policy that considers how they identify and address risks throughout the entirety of the value chain, from tier 3 to post-consumer waste, the size of the company, and the specific context of the business and environments in which they operate.

They should also include ongoing review and reporting<sup>82</sup>. Companies that do this best lead from the top, with executives fully engaged in the process of ushering in a whole-of-organisation response<sup>83</sup>. The introduction

of comprehensive responsible business laws that required large companies to undertake human rights and environmental due diligence and ban imports manufactured by forced labour would promote these best practice approaches across our economy.

The fashion industry is a complex and globalised system built on the continued impacts of colonialism and racism – supplying low-cost clothing to western consumers by devaluing the labour of (mostly women) workers in the south<sup>84</sup>. This is the context in

82 "Human Rights Due Diligence: An Overview" (Oxfam America), accessed July 14, 2025, [https://webassets.oxfamamerica.org/media/documents/OUS\\_issue\\_brief\\_HRDD.pdf?utm\\_source=chatgpt.com](https://webassets.oxfamamerica.org/media/documents/OUS_issue_brief_HRDD.pdf?utm_source=chatgpt.com).

83 World Benchmarking Alliance, "Some Companies Show That Transformative Change Is Possible within Five Years," *Some Companies Show That Transformative Change Is Possible within Five Years* (blog), accessed June 23, 2025, <https://www.worldbenchmarkingalliance.org/publication/chrb/findings/some-companies-show-that-transformative-change-is-possible-within-five-years/>.

84 Harriette Richards, "Risk, Reporting and Responsibility: Modern Slavery, Colonial Power and Fashion's Transparency Industry," *International Journal for Crime, Justice and Social Democracy* 11, no. 2 (June 3, 2022): 47–60, <https://doi.org/10.5204/ijcsd.2378>.

which fashion brands operate. Any attempt to develop human rights policies should address the inherent power imbalance between wealthy brands, some of which are owned by the wealthiest people on the planet<sup>85</sup>, and the workers in their supply chains. Because of this power imbalance, policies to address human rights should always seek to bolster the power of workers. Policies that improve consumers' knowledge can be a useful part of the mix, so that their buying power can support human rights. Many consumers would like to do the right thing, but are left confused in a sea of green and blue washing.

Appropriate actions that prevent and address human rights impacts should seek to rebalance the power that big corporations have over their less powerful suppliers, and also improve workers' leverage and agency. They can do this by: implementing responsible purchasing practices, having effective grievance mechanisms in place, and supporting strong independent unions, involving them in worker-led or worker-centric due diligence.

The following discussion is not an exhaustive list of steps brands can take to mitigate adverse human rights impacts, rather, it provides some examples of steps brands can take to improve their internal policies. It also considers some of the more transformative industry-wide trends that could be fostered by the introduction of mandatory human rights due diligence in Australia.

## 5.1 Responsible purchasing practices

Irresponsible purchasing practices lead to various exploitative and high-risk conditions, including withheld wages, excessive or forced overtime and unauthorised subcontracting. Poor practices such as short lead times and last-minute order changes are common in today's ultra-fast and fast fashion industries<sup>86</sup>.

**Responsible purchasing practices recognise the leverage buyers have over their suppliers and seek to ensure human rights are upheld.** One method buyers can use to support human rights is contractual agreements. These can preclude actions that violate or risk human rights, and promote actions that support workers' power and agency through higher wages or

improved conditions. These contractual assurances – clauses that preclude practices such as the use of child or forced labour or unauthorised subcontractors – are an important and necessary part of responsible business practices. However, without complementary responsible purchasing practices to support suppliers to comply, the risk of these clauses being violated is high<sup>87</sup>. This is well known in the fashion industry, and demonstrated by our research, where key informants and workers reported that the purchasing practices of big brands overly emphasised delivery and product quality without sufficient concern that this may lead to the use of subcontractors.

---

*“Buyers and their representatives have a tendency to focus on quality and timely delivery. They do not pay much attention to illegal subcontracting.”*

– CIVIL SOCIETY REPRESENTATIVE

---

Oxfam Australia's 2020 report, *Shopping for a Bargain*, highlighted the purchasing practices of 10 big Australian brands. The report identified a number of behaviours that could lead to issues like forced overtime, worker harassment and abuse, and the engagement of subcontractors. These behaviours included forecasting, order placement, lead time, last-minute changes, payment terms and conditions, and paying on time. Any efforts by brands to address potential adverse human rights impacts should address all these intervention points, acknowledging brands' power over suppliers and avoiding any behaviour that could push unreasonable price or time demands onto workers.

The recommendations in *Shopping for a Bargain* on compliance-based measures and suppliers' contractual arrangements remain relevant and could form part of a company's purchasing practices policy to demonstrate due diligence:

- Publish and regularly update a list of the factories from which they source.
- Publish a public commitment and a plan to ensure the payment of living wages throughout their supply chains, including a timeframe for achieving key milestones.

---

85 Forbes Real Time Billionaires List - The World's Richest People," accessed June 23, 2025, <https://www.forbes.com/real-time-billionaires/#6c0dbc133d78>.

86 Aruna Kashyap, "Paying for a Bus Ticket and Expecting to Fly" (Human Rights Watch, April 23, 2019), <https://www.hrw.org/report/2019/04/24/paying-bus-ticket-and-expecting-fly/how-apparel-brand-purchasing-practices-drive>.

87 Sofia Gonzalez De Aguinaga, "Updated-HRDD-Briefing" (Modern Slavery and Human Rights Policy and Evidence Centre, March 2024), <https://files.modernslaverypec.org/production/assets/downloads/Updated-HRDD-briefing.pdf?dm=1736268046>.

- Publish a responsible purchasing practices policy, aligned with the UN Guiding Principles on Business and Human Rights, and the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector
- The policy must be developed in consultation with labour unions and workers. It must:
  - Ensure labour costs are ‘ringfenced’ (calculated and listed as a separate item) in price negotiations with suppliers to facilitate payment of a living wage
  - Outline a plan to embed the policy across all departments of the brands, agents and factory performance assessments, incentives and training programs
  - Set key performance indicators to monitor improvement in purchasing practices and set out a timeline for publicly reporting progress
  - Include a mechanism for suppliers to provide anonymous feedback on the brand’s purchasing practices
  - Join initiatives that combine collective brand reform on purchasing practices<sup>88</sup>.

Our engagement with brands through the What She Makes Campaign has highlighted that significant structural barriers make it difficult for brands to address human rights issues in their supply chains. For example, an individual Australian brand may represent only a small share of a factory’s total production. This limits its ability to influence working conditions, even when it applies best-practice purchasing methods. A lack of leverage is not unique to the garment industry, with businesses across other sectors reporting staff having limited authority to address impacts<sup>89</sup>. However, businesses can take actions to increase their leverage by offering additional support to suppliers in the form of training or capacity building, or by collaborating<sup>90</sup>. Over the

longer term, if a business was taking a whole-of-business strategic approach to human rights, it could rationalise supply chains by placing greater emphasis on suppliers who can truly meet human rights standards, rather than delivering the lowest cost, and develop long-term partnerships<sup>91</sup>.

These issues are common to private compliance initiatives and corporate social responsibility programs, because their lack of coordination with local laws, narrow scope and voluntary nature limit their effectiveness<sup>92</sup>. Transformational change is possible when the majority of the supply chain is included and on-the-ground actions support the policies and procedures set in boardrooms<sup>93</sup>. This type of change is supported by social governance rather than private compliance, where business, government, civil society, workers and unions work together to improve conditions and mitigate human rights risks. The introduction of mandatory human rights due diligence presents an exciting opportunity and an essential response to the introduction of similar laws globally. Australian companies need a framework to support collaboration with each other, government, civil society, workers and their representatives to improve the leverage of Australian brands in a global market, so that changes to purchasing practices can bring about maximum positive change and support human rights in global supply chains.

## 5.2 Worker-led due diligence and trade unions

Worker and union-led due diligence provides an opportunity to support and uphold human rights at every stage of the due diligence process. This includes identifying risks, developing plans to prevent and mitigate them, monitoring and evaluating effectiveness, communicating with workers, and supporting any necessary remediation<sup>94</sup>.

88 Nayeem Emran, Matthew Phillips and Sarah Rogan, “Shopping for a Bargain - How the Purchasing Practices of Clothing Brands in Australia Impact the Women Who Make Our Clothes” (Melbourne, Australia: Oxfam Australia, November 2020), <https://www.oxfam.org.au/wp-content/uploads/2022/12/Official-Shopping-for-a-Bargain-2020.pdf>.

89 “Human Rights in Supply Chains: Promoting Positive Practice” (Melbourne, Australia: AHRC, ACCSR, GCNA, December 2015).

90 “Guiding Principles on Business and Human Rights, Implementing the United Nations ‘Protect, Respect and Remedy’ Framework” (Geneva and New York: United Nations, 2011).

91 “Human Rights in Supply Chains: Promoting Positive Practice” (Melbourne, Australia: AHRC, ACCSR, GCNA, December 2015), [https://humanrights.gov.au/sites/default/files/document/publication/2015\\_AHRC\\_ACCSR\\_HR\\_in\\_supply\\_chains.pdf](https://humanrights.gov.au/sites/default/files/document/publication/2015_AHRC_ACCSR_HR_in_supply_chains.pdf).

92 “Workplace Compliance in Global Supply Chains” (Geneva: ILO, 2016), [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed\\_dialogue/%40sector/documents/publication/wcms\\_540914.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_dialogue/%40sector/documents/publication/wcms_540914.pdf).

93 Martin Thurley, “Comment: Lessons from 10 Years of Working Together to Address Human Rights in the Thai Seafood Industry,” Reuters, October 14, 2024, sec. Society & Equity, <https://www.reuters.com/sustainability/society-equity/comment-lessons-10-years-working-together-address-human-rights-thai-seafood-2024-10-14/>.

94 “Guiding Principles on Business and Human Rights, Implementing the United Nations ‘Protect, Respect and Remedy’ Framework” (Geneva and New York: United Nations, 2011).



Dhaka, Bangladesh: Kalpona Akter, founder of the Bangladesh Centre for Workers Solidarity at her office. Photo: Fabeha Monir/Oxfam.

Diagram 2: The due diligence process



**IDENTIFYING RISKS**

- Share insights into risks
- Gather data and share for transparency, especially helpful for small operations



**PREVENTING AND MITIGATING RISKS**

- Share insights into risks
- Advocate for increased wages



**MONITORING AND EVALUATING EFFECTIVENESS**

- Gather data and share for transparency, especially helpful for small operations
- Share insights into risks



**COMMUNICATING WITH WORKERS**

- Educate workers on their rights



**SUPPORTING REMEDIATION**

- Raise awareness of grievance mechanisms and support training
- Support workers to access remediation and provide legal support<sup>95</sup>.

95 Anastasiia Kliuha, Lois Bosatta, and Katarina Schwarz, "Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report" (Nottingham, UK: Goodweave, January 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.

Importantly, approaches to mandatory human rights and environmental due diligence have emerged from the Global North and are rooted in the same systems of colonialism that underpin the exploitation of workers. Therefore, **the involvement of workers, their unions, and communities should not be an afterthought but a central element in developing due diligence approaches that neither perpetuate nor prove ineffective against exploitation. Supporting workers' ability to organise and collectively improve their leverage is essential to ensuring any changes upstream to the legislative environment or private compliance initiatives result in real improvements to human rights and conditions for workers.** Freedom of association is a key enabling right that forms a base from which human rights can be obtained and guaranteed<sup>96</sup>, including the ability to raise grievances and seek redress. Without organised workers, who are aware of their rights and have mechanisms to raise issues and seek redress, efforts to improve human rights and working conditions can lead to unintended or even harmful outcomes. For example, following a recent (and insufficient) minimum wage increase in Bangladesh, some factory owners reportedly responded by reducing overtime hours while increasing daily production targets. These changes were often enforced through harassment and abuse, and resulted in violations of basic rights such as access to breaks, adequate nutrition and hydration, and the ability to use the toilet<sup>97</sup>. Speaking about the recent minimum wage increase, a subcontracting agent we interviewed shared her observations: "Abuse has increased in the garment factories, especially against female workers. While wages are raised, work pressure is also increased. Production targets are pushed higher, making it difficult for female workers to keep up. After about 30 years [of age], female workers become physically weaker and cannot handle extra production. Additionally, overtime hours are reduced to avoid paying overtime wages."

The International Labour Organization has highlighted the importance of social governance as a mechanism to promote and protect working conditions and uphold labour laws. Specifically, its Declaration on Social Justice for a Fair Globalization states social governance as "the most appropriate methods for making labour law and institutions effective, including in respect of the recognition of the employment relationship, the promotion of good industrial relations and the building of effective labour inspection systems"<sup>98</sup>. Collective bargaining is a key and longstanding tool to support social governance where workers can be represented by unions to uphold and set mutually beneficial employment terms and raise concerns about safety and risks to human rights<sup>99</sup>. If the Australian Government and big Australian brands are serious about protecting human rights in supply chains, we must support workers' voices, freedom of association, and unions, as they are key to ensuring mandatory human rights due diligence or any other frameworks, including existing modern slavery protections, are more than just a 'tick-box exercise'<sup>100</sup>. However, the ability for workers to organise is under threat from a changing industry, which is seeing higher rates of subcontracting and informal work<sup>101</sup>. Another threat is the lack of representation for workers in countries where unions are weak and support employers rather than workers. For example, China there is only one permitted trade union<sup>102</sup>. Even in Bangladesh, where strong and independent unions operate, workers face many barriers to organising. It is difficult to register as a trade union and requests are arbitrarily denied, employers routinely use union busting techniques such as sacking union leaders, and most worryingly, workers protests are violently quashed. In 2023, for example, workers were killed in minimum wage protests<sup>103</sup>. A number of Bangladeshi union organisers contributed to this research, further demonstrating the role unions can play in assessing the effectiveness of

96 Aidan McQuade, "Grievance Mechanisms Remedies and Trades Unions," December 2017, [https://www.ethicaltrade.org/sites/default/files/shared\\_resources/grievance\\_mechanisms\\_remedies\\_and\\_trades\\_unions\\_eti\\_aidan\\_mcquade\\_dec\\_2017\\_final.pdf?utm\\_source=chatgpt.com](https://www.ethicaltrade.org/sites/default/files/shared_resources/grievance_mechanisms_remedies_and_trades_unions_eti_aidan_mcquade_dec_2017_final.pdf?utm_source=chatgpt.com).

97 Anastasiia Kliuha, Lois Bosatta, and Katarina Schwarz, "Modern Slavery and Child Labour in the RMG Sector of Bangladesh Report" (Nottingham, UK: Goodweave, January 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>.

98 "ILO Declaration on Social Justice for a Fair Globalization, 2008" (ILO, October 25, 2018), <https://doi.org/10.1017/9781316677117.063>.

99 "Workplace Compliance in Global Supply Chains" (Geneva: ILO, 2016), [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed\\_dialogue/%40sector/documents/publication/wcms\\_540914.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_dialogue/%40sector/documents/publication/wcms_540914.pdf).

100 "Making Human Rights Due Diligence Legislation Work for Unions," IndustriALL, June 10, 2025, <https://www.industriall-union.org/making-human-rights-due-diligence-legislation-work-for-unions>.

101 "Workplace Compliance in Global Supply Chains" (Geneva: ILO, 2016), [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed\\_dialogue/%40sector/documents/publication/wcms\\_540914.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_dialogue/%40sector/documents/publication/wcms_540914.pdf).

102 Liva Sreedharan and Aarti Kapoor, "Pins and Needles-Vietnam-Supply-Chains-Report" (Anti-Slavery International, Embode Ltd, 2018), <https://www.antislavery.org/wp-content/uploads/2019/04/Pins-and-Needles-Vietnam-supply-chains-report.pdf>.

103 "Garment Workers Must Receive Rights-Based Compensation and Justice Immediately," *Amnesty International* (blog), May 1, 2024, <https://www.amnesty.org/en/latest/news/2024/05/bangladesh-garment-workers-must-receive-rights-based-compensation-and-justice-immediately/>.

frameworks by providing oversight and sharing their insights into the risks of the industry.

So, how should companies work with unions and what might constitute due diligence in this respect? There are benefits to companies engaging directly with trade unions as they can identify issues in supply chains that audits and compliance might miss, so that issues can be addressed before they escalate into significant risks to human rights and safety<sup>104</sup>. Even if companies have established grievance and redress mechanisms in place, these should be considered only partially effective without the support of trade union engagement<sup>105</sup>. At a bare minimum, all companies should be aware of the trade unions operating in the countries and cities from which they source goods, and ideally, they should have direct relationships with the unions operating in the markets where they manufacture<sup>106</sup>. They could invite unions to participate in their auditing processes, establish formal pathways for unions to raise concerns, and create working groups with unions and other stakeholders to address specific issues.

Companies should thoroughly analyse the local laws governing organised labour in the areas where they manufacture, particularly considering the national context but also any special economic zones that might restrict workers' rights in order to attract

foreign investment. Rather than simply complying with local laws, companies have a responsibility to understand their implications, the risks they pose to human rights, and to take appropriate action<sup>107</sup>. This may involve working with suppliers and workers to improve worker-led due diligence by implementing alternative arrangements for democratic representation. Factory workers could co-create codes of conduct and policies to support their representation. If worker voice and representation cannot be improved, then companies should relocate operations to jurisdictions where local laws support strong and independent trade unions<sup>108</sup>.

Despite the obvious benefits to buyers, suppliers and workers, there are cultural barriers within corporations that obstruct deep engagement with trade unions. Some employers view engagement as a burden<sup>109</sup> and feel the aims of unions create tension with the companies' primary aims of low price and promoting flexibility<sup>110</sup>. These cultural barriers are significant and underscore the need to implement mandatory human rights due diligence legislation that mandates and enforces worker engagement<sup>111</sup>. The Australian Government should promote union and worker supportive laws and practices at the highest level.

---

104 "Garment Workers Must Receive Rights-Based Compensation and Justice Immediately," *Amnesty International* (blog), May 1, 2024, <https://www.amnesty.org/en/latest/news/2024/05/bangladesh-garment-workers-must-receive-rights-based-compensation-and-justice-immediately/>.

105 Justine Nolan et al., "Good Practice Toolkit Report: Strengthening Modern Slavery Responses," 2023, <https://www.humanrights.unsw.edu.au/sites/default/files/documents/Good%20practice%20toolkit%20report.pdf>.

106 Daniel Blackburn and Ciaran Cross, "Getting Informed about Unions Is Key to Engaging Workers in Global Supply Chains," Business & Human Rights Resource Centre, accessed July 11, 2025, <https://www.business-humanrights.org/en/blog/getting-informed-about-unions-is-key-to-engaging-workers-in-global-supply-chains/>.

107 David Kovick, David Vermijs, and Sara Blackwell, "Respecting Trade Union Rights In Global Value Chains" (New York: Shift, September 2019), <https://shiftproject.org/wp-content/uploads/2020/05/US-Respecting-TUR-digital-RV.pdf>.

108 Kelley K Bell et al., "Human Rights Due Diligence: Fundamentals for Impactful Implementation in Seafood, A Supplemental Resource to RISE" (Santa Cruz, CA, USA: FishWise, 2024).

109 Aidan McQuade, "Grievance Mechanisms Remedies and Trades Unions," December 2017, [https://www.ethicaltrade.org/sites/default/files/shared\\_resources/grievance\\_mechanisms\\_remedies\\_and\\_trades\\_unions\\_eti\\_aidan\\_mcquade\\_dec\\_2017\\_final.pdf?utm\\_source=chatgpt.com](https://www.ethicaltrade.org/sites/default/files/shared_resources/grievance_mechanisms_remedies_and_trades_unions_eti_aidan_mcquade_dec_2017_final.pdf?utm_source=chatgpt.com).

110 David Kovick, David Vermijs, and Sara Blackwell, "Respecting Trade Union Rights In Global Value Chains" (New York: Shift, September 2019), <https://shiftproject.org/wp-content/uploads/2020/05/US-Respecting-TUR-digital-RV.pdf>.

111 Shelley Marshall et al., "Mandatory Human Rights Due Diligence: Risks and Opportunities for Workers and Unions" (Monash Business School, 2023), [https://www.trafflab.org/files/ugd/11e1f0\\_eab816ce329043d5b50d8e59d3d881c6.pdf](https://www.trafflab.org/files/ugd/11e1f0_eab816ce329043d5b50d8e59d3d881c6.pdf).

# CONCLUSION

This report has demonstrated how slavery-like practices are impacting the lives of women and children in the garment industry and the potential exposure of Australian businesses. Despite public commitments to ethical sourcing, modern slavery risks remain deeply embedded — driven by low wages, insecure work, gender-based discrimination, and layered subcontracting that hides abuse from independent oversight. Brands continue to profit from informal and opaque sourcing models that obscure accountability and deny workers their rights.

We are calling for stronger laws to ensure no Australian business can profit from exploitation. Australia must urgently strengthen its modern slavery response by requiring companies to identify, prevent and remediate harm in their operations and supply chains, and by banning imported goods made

using forced labour. This would lead to safer workplaces, a fair day's pay for a fair day's work, a healthy environment that allows people to live a good life, and a chance for families to thrive. Workers and their families must be at the heart of our response, so that we can all be confident that the clothes we wear are not made at the expense of someone's dignity.

The voices of workers shared in this report should leave no doubt: they know their labour is part of the global supply chain, they understand that the pressures on their work are imposed by distant buyers, and they know they are being exploited. Workers and their representatives are fighting for their rights at enormous personal cost. Australia must introduce comprehensive responsible business laws to compel the use of responsible business practices that could make a real difference to workers' lives.



Textile workers on their way to home during lunch break. Dhaka, Bangladesh. Photo: Fabeha Monir/Oxfam





42 years old Laily\* works as a homebased garment worker. She joined garment factory at 12. Since 2019, she started working from home. Laily\* brings orders from small factories and do them. Order like bed sheets, pillow covers, and one-piece dresses, these orders are given at home for sewing. With her income she hardly can earn 5000 taka. Mirpur, Dhaka, Bangladesh. Photo: Fabeha Monir/Oxfam.

# APPENDIX 1: APPROACH AND METHODS

Oxfam Australia and our colleagues at Oxfam in Bangladesh worked with partners to conduct qualitative and quantitative research with home- and factory-based garment workers living in Bangladesh.

## QUANTITATIVE SURVEYS

Oxfam Australia partnered with Dnet, a Bangladesh-based social enterprise offering services such as research consultants. This research project was overseen by Dr. Shah Md. Ahsan Habib, Professor, Bangladesh Institute of Bank Management (BIBM) and Co-lead M Shahadat Hossain, Executive Director, Dnet. Together with Oxfam Australia and Oxfam in Bangladesh, Dnet hosted a sensemaking workshop in May 2024 to begin the research phase. In attendance were garment workers, workers' rights organisations, academics, civil society groups, plus government and business representatives. There were significant delays in completing the project due to widespread protests and movements aimed at removing the Bangladeshi Government from power. These protests disrupted normal operations across the country, including a ten-day suspension of internet services. The final report for the research project was provided to Oxfam Australia in October 2024.

The primary locations chosen for this study encompassed Dhaka, Gazipur, Narayanganj and Chittagong. These locations were recognised as prominent garment manufacturing hubs within Bangladesh, serving as pivotal contributors to the textile and apparel industry. These cities play a crucial role in the global supply chain, as they host a significant number of factories engaged in the production of garments for Australian brands.

The study used purposive and snowball sampling to represent the target population and achieve study coverage, with a final response size of 401 workers, made up of 242 workers from export-oriented factories and 159 home-based or supply chain workers involved in finishing tasks. Workers completed a survey administered by trained enumerators and there were also key informant interviews, focus groups and in-depth interviews. Although a detailed questionnaire and interview protocol were developed, not all information could

be collected due to the prevailing situation in the country.

## FINDINGS AND LIMITATIONS OF THIS DATA

This data points to strong evidence of forced labour across a number of measures, including compulsory overtime and withholding of wages and identity documents. The strength of this data as evidence stems from its binary nature — workers answered yes or no to a series of direct questions — and a significant number of responses. The subsequent sections of the report will address significant findings in detail. Qualitative data was not provided and while the quantitative data set is rich, it lacks the human insight of case studies, especially when trying to understand how workers might feel unable to leave exploitative workplaces or refuse excessive overtime. Given these limitations, we sought another partner to conduct qualitative research.

## QUALITATIVE RESEARCH

We engaged a long-term Oxfam partner, Karmojibi Nari (KN), a Dhaka-based women's rights organisation with a long history of supporting women in the garment industry to understand their rights at work and home. They run 'women's cafes'.

Karmojibi Nari completed eight focus group discussions, seven key informant interviews and collected five case studies. This totalled 20 data items, which included participation of 67 respondents. The research project was overseen by Tarek Aziz, Program Coordinator at Oxfam in Bangladesh, and Rabita Islam, Deputy Director (Programs) at Karmojibi Nari. The research was conducted by staff at Karmojibi Nari. The data was collected in May and June 2025.

These interviews and discussions were central to the research, providing vital insight into the lived realities of workers — insight that is often absent from corporate reporting and government statistics. Hearing directly from workers ensures their voices, experiences and demands are at the heart of efforts to end exploitation in garment supply chains. Without their testimony, the scale and depth of modern slavery risks remain invisible.



# BIBLIOGRAPHY

Thaslima Begum, "A Nightmare I Couldn't Wake up from': Half of Rana Plaza Survivors Unable to Work 10 Years after Disaster," Global Development, *The Guardian*, April 28, 2023, <https://www.theguardian.com/global-development/2023/apr/28/a-nightmare-i-couldnt-wake-up-from-half-of-rana-plaza-survivors-unable-to-work-10-years-after-disaster>

"Ajirun | Oxfam Australia," accessed July 14, 2025, <https://www.oxfam.org.au/what-she-makes/stories/ajirun/>

Ali Mohammad et al., *Assesment on the Socio-Economic Condition of Home-Based RMG Workers in the RMG Supply Chain- Study Report.Pdf* (Bangladesh Labour Foundation (BLF), 2025), [https://drive.google.com/file/d/1CV\\_DaMSLjCVbL3UwVlastTxN4q7LGoLM/view](https://drive.google.com/file/d/1CV_DaMSLjCVbL3UwVlastTxN4q7LGoLM/view)

World Intergrated Trade Solution, "Australia Textiles and Clothing Imports by Country in US\$ Thousand 2022," October 6, 2025, [https://wits.worldbank.org/CountryProfile/en/Country/AUS/Year/LTST/TradeFlow/Import/Partner/by-country/Product/50-63\\_TextCloth](https://wits.worldbank.org/CountryProfile/en/Country/AUS/Year/LTST/TradeFlow/Import/Partner/by-country/Product/50-63_TextCloth)

"Australian Government Response to the Review Report of the Modern Slavery Act 2018 (Cth) | Attorney-General's Department," December 2, 2024, <https://www.ag.gov.au/crime/publications/australian-government-response-review-report-modern-slavery-act-2018-cth>

Chris Redman, "Australians Revealed as World's Biggest Fashion Consumers, Fuelling Waste Crisis," *The Australia Institute*, May 28, 2024, <https://australiainstitute.org.au/post/australians-revealed-as-worlds-biggest-fashion-consumers-fuelling-waste-crisis/>

Bangladesh Labour Act, 2006. Accessed July 15, 2025. [https://mccibd.org/wp-content/uploads/2021/09/Bangladesh-Labour-Act-2006\\_English-Upto-2018.pdf](https://mccibd.org/wp-content/uploads/2021/09/Bangladesh-Labour-Act-2006_English-Upto-2018.pdf)

Adelaide Miller, "Brands See Demand for Australian-Made Clothes but 'Very Little Capability,'" *ABC News*, May 29, 2025, <https://www.abc.net.au/news/2025-05-30/push-to-bring-fashion-manufacturing-back-to-australia/105338638>

Freya Dinshaw et al., *Broken Promises Modern Slavery Report: Two Years of Corporate Reporting under Australia's Modern Slavery Act* (2022), <https://www.hrlc.org.au/app/uploads/2025/04/2211-Broken-Promises-Modern-Slavery-Report.pdf>

Felipe Caro and Leonard Lane, "Can Brands Claim Ignorance? Unauthorized Subcontracting in Apparel Supply Chains," *Managment Science*, April 2021; "China - Minimum Wage - Guangdong," WageIndicator Foundation, accessed July 21, 2025, <https://wageindicator.org/salary/minimum-wage/china-custom/6839-guangdong>

"City Chic Modern Slavery Statement," City Chic, 2023, <https://modernslaveryregister.gov.au/statements/b1mKGyBcCq9KdAr/pdf>

Kayla Wheeler, Clothing Retailing in Australia, IBIS World, Retail Trade-G4251, May 2025

Martin Thurley and Martin Thurley, "Comment: Lessons from 10 Years of Working Together to Address Human Rights in the Thai Seafood Industry," *Society & Equity*, *Reuters*, October 14, 2024, <https://www.reuters.com/sustainability/society-equity/comment-lessons-10-years-working-together-address-human-rights-thai-seafood-2024-10-14/>

Consolidated Federal Laws of Canada, Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024). <https://laws.justice.gc.ca/eng/acts/F-10.6/>

"Convention C029 - Forced Labour Convention, 1930 (No. 29)," ILO, June 10, 1930, [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C029](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029)

“Convention on the Rights of the Child,” OHCHR, accessed July 29, 2025, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

*Corporate Criminal Responsibility: Final Report* (Australian Law Reform Commission, 2020); Criminal Code Act 1995 (1995). <https://www.legislation.gov.au/C2004A04868/latest>

Legality Simplified, *Delhi Issues New Minimum Wages and DA - Legality Simplified*, April 19, 2025, <https://www.legalitysimplified.com/delhi-issues-new-minimum-wages-and-da/>

Directive - EU - 2024/1760 - EN - EUR-Lex (2024). <https://eur-lex.europa.eu/eli/dir/2024/1760/oj/eng>

Sarah Butler, “Fashion Retailer Shein Finds Child Labour in Its Supply Chain,” Business, *The Guardian*, August 23, 2024, <https://www.theguardian.com/business/article/2024/aug/23/shein-fashion-retailer-child-labour-supply-chain>

“*Forbes Real Time Billionaires List - The World’s Richest People*,” accessed June 23, 2025, <https://www.forbes.com/real-time-billionaires/#6c0dbc133d78>

“*Forced Labor Among Informal Apparel Workers in Apparel Hubs of Bangladesh: A Prevalence Estimation Report*,” Global Fund to End Modern Slavery, 2023, [https://humantraffickingsearch.org/wp-content/uploads/2023/03/22.12.14\\_Informal\\_Apparel-Prevalence-Brief.pdf](https://humantraffickingsearch.org/wp-content/uploads/2023/03/22.12.14_Informal_Apparel-Prevalence-Brief.pdf)

“Garment Workers Must Receive Rights-Based Compensation and Justice Immediately,” *Amnesty International*, May 1, 2024, <https://www.amnesty.org/en/latest/news/2024/05/bangladesh-garment-workers-must-receive-rights-based-compensation-and-justice-immediately/>

Rahima Akter et al., “Gender-Based Violence and Harassment in Bangladesh’s Ready-Made Garments (RMG) Industry: Exploring Workplace Well-Being Issues in Policy and Practice,” *Sustainability* 16, no. 5 (2024): 5, <https://doi.org/10.3390/su16052132>

Daniel Blackburn and Ciaran Cross, “*Getting Informed about Unions Is Key to Engaging Workers in Global Supply Chains*,” Business & Human Rights Resource Centre, accessed July 11, 2025, <https://www.business-humanrights.org/en/blog/getting-informed-about-unions-is-key-to-engaging-workers-in-global-supply-chains/>

Justine Nolan et al., *Good Practice Toolkit Report: Strengthening Modern Slavery Responses* (2023), <https://www.humanrights.unsw.edu.au/sites/default/files/documents/Good%20practice%20toolkit%20report.pdf>;

Aidan McQuade, “*Grievance Mechanisms Remedies and Trades Unions*,” December 2017, [https://www.ethicaltrade.org/sites/default/files/shared\\_resources/grievance\\_mechanisms\\_remedies\\_and\\_trades\\_unions\\_eti\\_aidan\\_mcquade\\_dec\\_2017\\_final.pdf](https://www.ethicaltrade.org/sites/default/files/shared_resources/grievance_mechanisms_remedies_and_trades_unions_eti_aidan_mcquade_dec_2017_final.pdf)

“Guidance on Sumangali India,” Fair Wear, March 2015, <https://api.fairwear.org/wp-content/uploads/2020/09/Guidance-on-Sumangali-India.pdf>

*Guiding Principles on Business and Human Rights, Implementing the United Nations “Protect, Respect and Remedy” Framework* (United Nations, 2011)

Martje Theuws, “*Hidden Subcontracting in the Garment Industry: Zooming in on the Role of Buying Companies*,” Centre for Research on Multinational Corporations, September 2015, <https://www.somo.nl/wp-content/uploads/2015/09/Hidden-subcontracting.pdf>

“HM Group Modern Slavery Statement 2024,” H&M, 2024, <https://hmgroupp.com/wp-content/uploads/2025/03/HM-Group-Modern-slavery-statement-2024.pdf>

“HM-Group-Remuneration-Report-2024,” accessed July 21, 2025, <https://hmgroupp.com/wp-content/uploads/2025/03/HM-Group-Remuneration-report-2024.pdf>

"Home Based Workers Sector Summary," Women in Informal Employment: Globalizing and Organizing, 2019, <https://www.wiego.org/wp-content/uploads/2019/09/WIEGO-Home-Based-Workers-Sector.pdf>

"Home-Based Workers - HomeNet International - Home-Based Workers," *HomeNet International*, n.d., accessed July 27, 2025, <https://www.homenetinternational.org/about/home-based-workers/>

ILO-MAMPU Project, *Home-Based Workers: Decent Work and Social Protection through Organization and Empowerment - Experiences, Good Practices and Lessons from Home-Based Workers and Their Organizations* (ILO, 2015), <https://www.ilo.org/publications/home-based-workers-decent-work-and-social-protection-through-organization>

"Human Rights Due Diligence: An Overview," Oxfam America, n.d., accessed July 14, 2025, [https://webassets.oxfamamerica.org/media/documents/OUS\\_issue\\_brief\\_HRDD.pdf](https://webassets.oxfamamerica.org/media/documents/OUS_issue_brief_HRDD.pdf)

Kelley K Bell et al., *Human Rights Due Diligence: Fundamentals for Impactful Implementation in Seafood, A Supplemental Resource to RISE* (FishWise, 2024); *Human Rights in Supply Chains: Promoting Positive Practice* (AHRC, ACCSR, GCNA, 2015), [https://humanrights.gov.au/sites/default/files/document/publication/2015\\_AHRC\\_ACCSR\\_HR\\_in\\_supply\\_chains.pdf](https://humanrights.gov.au/sites/default/files/document/publication/2015_AHRC_ACCSR_HR_in_supply_chains.pdf)

"Human Trafficking and Exploitation - AFP," accessed July 21, 2025, <https://www.afp.gov.au/crimes/human-trafficking-and-people-smuggling/human-trafficking-and-slavery>

"ILO Declaration on Social Justice for a Fair Globalization, 2008," ILO, October 25, 2018, <https://doi.org/10.1017/9781316677117.063>

"ILO Indicators of Forced Labour," ILO, October 2012, [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed\\_norm/%40declaration/documents/publication/wcms\\_203832.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_norm/%40declaration/documents/publication/wcms_203832.pdf)

*Improving Working Conditions in the RMG Sector Phase-II: Baseline Study Report* (ILO, 2019), [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40asia/%40ro-bangkok/%40ilo-dhaka/documents/publication/wcms\\_735614.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40asia/%40ro-bangkok/%40ilo-dhaka/documents/publication/wcms_735614.pdf)

"India: NGO Transparentem Traces Cotton Farmed under Conditions of Forced & Child Labour to Multinational Apparel Brands & Retailers," Business & Human Rights Resource Centre, accessed July 15, 2025, <https://www.business-humanrights.org/en/latest-news/india-ngo-transparentem-traces-cotton-farmed-under-conditions-of-forced-child-labour-to-multinational-apparel-brands-retailers/>

"International Covenant on Civil and Political Rights," OHCHR, accessed July 29, 2025, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>

"Kathmandu Modern Slavery Statement," Kathmandu, 2023, [https://kathmandu001.cdn.prismic.io/kathmandu001/1167db37-7aa1-4090-a837-ec80b0ea0dfb\\_KMD\\_ModernSlavery\\_140923\\_V5.pdf](https://kathmandu001.cdn.prismic.io/kathmandu001/1167db37-7aa1-4090-a837-ec80b0ea0dfb_KMD_ModernSlavery_140923_V5.pdf)

Labour Law of the Peoples Republic of China (1994). [http://www.npc.gov.cn/zgrdw/englishnpc/Law/2007-12/12/content\\_1383754.htm](http://www.npc.gov.cn/zgrdw/englishnpc/Law/2007-12/12/content_1383754.htm)

"List of Goods Produced by Child Labor or Forced Labor," US Department of Labor, accessed July 14, 2025, <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print>

S Nayeem Emran et al., *Made in Poverty – The True Price of Fashion* (Oxfam Australia, 2019)

"Making Human Rights Due Diligence Legislation Work for Unions," IndustriALL, June 10, 2025, <https://www.industriall-union.org/making-human-rights-due-diligence-legislation-work-for-unions>

Shelley Marshall et al., *Mandatory Human Rights Due Diligence: Risks and Opportunities for Workers and Unions* (Monash Business School, 2023), [https://www.trafflab.org/\\_files/ugd/11e1f0\\_eab816ce329043d5b50d8e59d3d881c6.pdf](https://www.trafflab.org/_files/ugd/11e1f0_eab816ce329043d5b50d8e59d3d881c6.pdf)

Modern Slavery Act 2018 (2018). <https://www.legislation.gov.au/C2018A00153/latest>

Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023 – Parliament of Australia (2023). [https://www.aph.gov.au/Parliamentary\\_Business/Bills\\_Legislation/Bills\\_Search\\_Results/Result?bld=r7122](https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r7122)

Anastasiia Kliuha et al., *Modern Slavery and Child Labour in the RMG Sector of Bangladesh Report* (Goodweave, 2025), <https://goodweave.org/wp-content/uploads/2025/02/Modern-Slavery-and-Child-Labour-in-the-RMG-Sector-of-Bangladesh-Report.pdf>

“Modern Slavery in Bangladesh,” *Walk Free*, n.d., accessed July 14, 2025, <https://www.walkfree.org/global-slavery-index/country-studies/bangladesh/>

“Modern Slavery in Bangladesh - Global Slavery Index 2023 Country Study,” *Walk Free*, 2023, <https://cdn.walkfree.org/content/uploads/2023/11/14130724/gsi-country-study-bangladesh.pdf>

“Modern Slavery in China,” *Walk Free*, n.d., accessed July 14, 2025, <https://www.walkfree.org/global-slavery-index/country-studies/china/>

“Modern Slavery in India,” *Walk Free*, n.d., accessed July 14, 2025, <https://www.walkfree.org/global-slavery-index/country-studies/india/>

“Myer Modern Slavery Statement 2024,” Myer, 2024, [https://investor.myer.com.au/FormBuilder/\\_Resource/module/8Ui4A1yDKkySwNHUlaYfCQ/file/Modern-Slavery-Statement-2024.pdf](https://investor.myer.com.au/FormBuilder/_Resource/module/8Ui4A1yDKkySwNHUlaYfCQ/file/Modern-Slavery-Statement-2024.pdf)

Sinclair, Amy, and Freya Dinshaw. *Paper Promises - Evaluating the Early Impact of Australia’s Modern Slavery Act*, 2022, [https://www.hrlc.org.au/app/uploads/2025/04/Paper-Promises\\_Australia-Modern-\\_Slavery-Act\\_7\\_FEB.pdf](https://www.hrlc.org.au/app/uploads/2025/04/Paper-Promises_Australia-Modern-_Slavery-Act_7_FEB.pdf)

Aruna Kashyap, “*Paying for a Bus Ticket and Expecting to Fly*” (Human Rights Watch, 2019), <https://www.hrw.org/report/2019/04/24/paying-bus-ticket-and-expecting-fly/how-apparel-brand-purchasing-practices-drive>

Liva Sreedharan and Aarti Kapoor, *Pins-and-Needles-Vietnam-Supply-Chains-Report* (Anti-Slavery International, Embode Ltd, 2018), <https://www.antislavery.org/wp-content/uploads/2019/04/Pins-and-Needles-Vietnam-supply-chains-report.pdf>

Regulation - EU - 2024/3015 - EN - EUR-Lex. Accessed July 29, 2025. <https://eur-lex.europa.eu/eli/reg/2024/3015/oj/eng>

John McMillan, *Report of the Statutory Review of the Modern Slavery Act 2018 (Cth) The First Three Years* (2018), <https://www.ag.gov.au/sites/default/files/2023-05/Report%20-%20Statutory%20Review%20of%20the%20Modern%20Slavery%20Act%202018.PDF>

David Kovick et al., *Respecting Trade Union Rights In Global Value Chains* (Shift, 2019), <https://shiftproject.org/wp-content/uploads/2020/05/US-Respecting-TUR-digital-RV.pdf>

Harriette Richards, “Risk, Reporting and Responsibility: Modern Slavery, Colonial Power and Fashion’s Transparency Industry,” *International Journal for Crime, Justice and Social Democracy* 11, no. 2 (2022): 2, <https://doi.org/10.5204/ijcsd.2378>

*Sexual Harassment and Violence against Garment Workers in Bangladesh* | ActionAid International (Action Aid, 2019), <https://actionaid.org/publications/2019/sexual-harassment-and-violence-against-garment-workers-bangladesh>

Nayeem Emran et al., *Shopping for a Bargain - How the Purchasing Practices of Clothing Brands in Australia Impact the Women Who Make Our Clothes* (Oxfam Australia, 2020), <https://www.oxfam.org.au/wp-content/uploads/2022/12/Official-Shopping-for-a-Bargain-2020.pdf>

World Benchmarking Alliance, “Some Companies Show That Transformative Change Is Possible within Five Years,” *Some Companies Show That Transformative Change Is Possible within Five Years*, n.d., accessed June 23, 2025, <https://www.worldbenchmarkingalliance.org/publication/chrp/findings/some-companies-show-that-transformative-change-is-possible-within-five-years/>

*Stitched with Slavery in the Seams* (Walk Free, 2023), <https://www.walkfree.org/global-slavery-index/findings/spotlights/stitched-with-slavery-in-the-seams/>

Attorney General’s Department, *Strengthening the Modern Slavery Act* (Consultation Paper, July 2025), p 26, [https://consultations.ag.gov.au/crime/modern-slavery-act/user\\_uploads/consultation-paper-strengthening-the-modern-slavery-act.pdf](https://consultations.ag.gov.au/crime/modern-slavery-act/user_uploads/consultation-paper-strengthening-the-modern-slavery-act.pdf)

“Super Retail Group 2023 Modern Slavery Statement,” Super Retail Group, 2023, <https://media.supercheapauto.com.au/corp/files/documents/2023%20Modern%20Slaver.pdf>

GRRR.nl, "Suppliers Are Expected to Respect Human Rights and Promote Gender Equality but Are Set up to Fail by Buying Companies," *World Benchmarking Alliance*, n.d., accessed June 23, 2025, <https://www.worldbenchmarkingalliance.org/publication/chrb/findings/suppliers-are-expected-to-respect-human-rights-and-promote-gender-equality-but-are-set-up-to-fail-by-buying-companies/>

Siddharth Kara, *Tainted Garments - The Exploitation of Women and Girls in India's Home-Based Garment Sector* (Blum Center for Developing Economies University of California, 2016), <https://blumcenter.berkeley.edu/wp-content/uploads/2019/01/Tainted-Garments-1.pdf>

THE CHILD LABOUR (PROHIBITION AND REGULATION) ACT, 1986 (1986). [https://labour.gov.in/sites/default/files/act\\_2.pdf](https://labour.gov.in/sites/default/files/act_2.pdf)

Sixth Tone, "The Shady Labor Practices Underpinning Shein's Global Fashion Empire," #SixthTone, September 17, 2021, <https://www.sixthtone.com/news/1008472>

Dr Huib Huyse, *TOWARDS WORKER-CENTERED HUMAN RIGHTS DUE DILIGENCE (HRDD)*, Policy Brief (KU Leuven, 2021), [https://hiva.kuleuven.be/sites/researchchairdw/Reports/worker\\_centered\\_HRDD\\_EN](https://hiva.kuleuven.be/sites/researchchairdw/Reports/worker_centered_HRDD_EN)

Jakir Hossain and Afroza Akter, "Trade union organizing in Bangladesh's ready-made garment sector amidst COVID pandemic: Status, challenges, and scope" (Workers Resource Centre-WRC, 2022)

"UNIQLO Modern Slavery Statement," Uniqlo, 2022, <https://modernslaveryregister.gov.au/statements/CcNhYCKfRdDrUer/pdf/>

United Nations, "Universal Declaration of Human Rights," United Nations, United Nations, accessed July 14, 2025, <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

Sofia Gonzalez De Aguinaga, "Updated-HRDD-Briefing," Modern Slavery and Human Rights Policy and Evidence Centre, March 2024, <https://files.modernslaverypec.org/production/assets/downloads/Updated-HRDD-briefing.pdf?dm=1736268046>

"Westfarmers Modern Slavery Statement 2023," Westfarmers, 2023, [https://www.wesfarmers.com.au/docs/default-source/sustainability/sustainability-2023/modern-slavery-statement-2023\\_final.pdf?sfvrsn=4baee0bb\\_3](https://www.wesfarmers.com.au/docs/default-source/sustainability/sustainability-2023/modern-slavery-statement-2023_final.pdf?sfvrsn=4baee0bb_3)

"Woolworths Group Announcement\_Retirement of MD and CEO," accessed July 28, 2025, [https://www.woolworthsgroup.com.au/content/dam/wwg/investors/asx-announcements/2024/Woolworths%20Group%20Announcement\\_Retirement%20of%20MD%20and%20CEO.pdf](https://www.woolworthsgroup.com.au/content/dam/wwg/investors/asx-announcements/2024/Woolworths%20Group%20Announcement_Retirement%20of%20MD%20and%20CEO.pdf) "Workers' and Employers' Organizations in China and Mongolia | International Labour Organization," January 28, 2024, <https://www.ilo.org/regions-and-countries/asia-and-pacific/ilo-china-and-mongolia-old/areas-work/workers%E2%80%99-and-employers%E2%80%99-organizations-china-and-mongolia>

*Workplace Compliance in Global Supply Chains* (ILO, 2016), [https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed\\_dialogue/%40sector/documents/publication/wcms\\_540914.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_dialogue/%40sector/documents/publication/wcms_540914.pdf)

Andrew Gibbs et al., "Workplace Violence in Bangladesh's Garment Industry," *Social Science & Medicine* 235 (August 2019): 112383, <https://doi.org/10.1016/j.socscimed.2019.112383>



**WHAT SHE  
MAKES**  
IS KEEPING HER IN POVERTY



**OXFAM**  
Australia