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Framing Modern Slavery: Do Stakeholders Talk Past Each Other?

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ABSTRACT

Modern slavery literature has thus far mostly adopted a downstream perspective, in the sense that researchers investigated corporate actors' responses after the enactment of transparency legislation. The common finding is that corporate disclosure is poor and ineffective, contributing to a failure to eradicate modern slavery. Our contribution is to adopt an upstream perspective in which we examine debates before regulation is crafted. We conceive of modern slavery as a public policy issue where multiple actors—NGOs, institutional investors, corporations and policymakers—hold various views about modern slavery and how to act upon it. Drawing on framing theory as used in public policy research, our aim is to uncover how stakeholders comparatively frame the issue of modern slavery, enabling a better understanding of why transparency legislation fails. Focussing on the Canadian context, where regulatory requirements on modern slavery were recently enacted, we examine an extensive set of communications, including testimony before parliamentary committees by four stakeholder groups. We explore stakeholders' rhetorical frames, uncovering how they conceive of modern slavery and their action frames, highlighting how they believe it should be acted upon. We show that stakeholders' rhetorical and action frames are embedded within overarching opposing metacultural frames, namely a community frame held by NGOs and a market frame held by institutional investors, corporations and policymakers. NGOs' community metacultural frame paves the way for approaches focused on eradication because harm to a community implies removing the harm. In opposition, other stakeholders' market metacultural frames pave the way for approaches focused on risk assessment, management and reporting, since the appearance of information on modern slavery and associated risks implies being able to manage it. Although stakeholders talk past each other about the issue of modern slavery, we identify possibilities for reframing, where holders of a market frame could move closer to a community frame.

1 | Introduction

An estimated 50 million people worldwide live in modern slavery (Walk Free 2023), making it “one of the most acute abuses of human rights in contemporary business practice” (Crane 2013, 49). Modern slavery generates billions of illegal profits each year (Christ et al. 2019); its eradication is one of the UN Sustainable Development Goals. As an umbrella term it refers to a complex phenomenon with a contested definition

(Mende 2019) that ranges from domestic servitude and sex slavery to organ trafficking and child exploitation, and includes forced labour, debt bondage, child labour and human trafficking (Christ et al. 2019; Crane 2013; Quirk 2006). It is also broad in its impact on its victims. Under modern slavery, people are “(1) forced to work through threat; (2) owned or controlled by an employer, typically through mental, physical, or threatened abuse; (3) dehumanized and treated as a commodity; (4) physically constrained or restricted in freedom of movement; [...] and

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(5) subject to economic exploitation through underpayment” (Crane 2013, 51).

Democracies operating in politically stable societies with higher levels of control of corruption and stricter rule of law (such as Australia, Western Europe and North America) are expected to be more responsive to modern slavery threats (Moussa et al. 2022). However, responsibility for practices falling under the umbrella of modern slavery is greater in countries that depend on imports linked to human exploitation (Shilling et al. 2021). The current study looks at this issue within the Canadian context, where an estimated US\$20 billion worth of goods at-risk of modern slavery are imported each year (Walk Free 2023). Indeed, through their supply chains, and whether consciously or unconsciously, many Canadian organizations contribute to the global phenomenon of modern slavery (All-Party Parliamentary Group to End Modern Slavery and Human Trafficking 2020). Although, on a global scale, Canada shows a low prevalence of modern slavery within its borders (Walk Free 2023), the country often relies on temporary foreign workers, and instances of debt bondage, emotional and physical abuse, wage theft, hazardous work conditions, long hours, sexual harassment and exploitation have been documented (Cecco 2024). Moreover, Canada has been criticized for its response to modern slavery, enacting legislation that does little to help Canadians avoid products made with forced or child labour (Amnesty International 2023).

Solutions to modern slavery are neither straightforward nor easy (Crane 2013). Most extant research on this issue has adopted what we call a “downstream” perspective, investigating corporate disclosures made in response to transparency legislation (e.g., Bayne et al. 2022; Christ and Burritt 2023; Christ et al. 2019; Kathyayini et al. 2022; Mai et al. 2023). Our interest in this study is in widening our understanding of the modern slavery issue by adopting what we call an “upstream” perspective that explores the broader policy debates leading to legislation. This public policy perspective recognizes that modern slavery implicates not only corporate actors but also their capital providers, governmental policymakers and NGOs which advocate for the victims. Each of these stakeholders may have a distinct view on the issue, and how to remedy it. We argue that before making sense of and understanding the (non)effectiveness of reporting regimes, we must look at the deeply layered frames of meaning held by these stakeholders and mobilized in the public policy processes leading to reporting regimes.

We examine how different stakeholders in Canada conceive of the issue of modern slavery. We ask the following research question: How do Canadian stakeholders comparatively frame the issue of modern slavery in their written communications? In terms of theoretical lens, we draw on framing theory as developed by public policy researchers Donald Schön and Martin Rein to examine the fundamental beliefs and views towards modern slavery held by these stakeholders. Frames generally refer to “schemata of interpretation” and help individuals to organize their understanding of the world around them (Goffman 1974). Schön and Rein (1994) and Rein and Schön (1996) consider that frames exist at three levels: rhetorical, action and metacultural. Indeed, they developed the notion that rhetorical

frames (at a discursive level) and action frames (at the level of implementation and action) unite in the metacultural (umbrella) frames which consolidate both of the lower-level frames. In terms of empirical setting, we consider the policy process leading to Canada’s Modern Slavery Act,¹ which came into force on January 1, 2024. We uncover actors’ views and beliefs through a close reading of stakeholder communications, including their respective publications and testimonies at a parliamentary committee.

Our interpretive analysis brings to light the existence of conflicting (and complementary) frames, as well as the prevalence of dominant frames, at *metacultural*, *rhetorical* and *action* levels. In concert with the work of Schön and Rein (1994), we argue that understanding policy frames is key not only to revealing what these divergent frames are and how they might be in conflict, but also because it is only through identifying and closely examining divergent frames that actors can begin to see alternative means to frame the same issue and, in so doing, construct the setting for frame reflection and change.

In what follows, we review relevant literature on modern slavery and present framing theory as understood by public policy researchers. We elaborate on our methodological approach and data, followed by our findings concerning how different actors frame modern slavery. Finally, we discuss implications and the potential for frame reflection.

2 | Modern Slavery: An Under Researched Topic

Modern slavery has garnered increasing attention in academic literature in recent years. Published across fields including supply chain management, human rights, law and accounting, this research highlights the multidimensional and multidisciplinary nature of the phenomenon (McLaren et al. 2024; Mehmood et al. 2023; Strand et al. 2024). The literature reveals a range of policy approaches pursued with the aim of combating modern slavery. At the weakest end of the spectrum, voluntary disclosures are generally seen as insufficient and of poor quality (Christ et al. 2019; Kathyayini et al. 2022). Mandatory disclosure regulation—also referred to as “transparency in the supply chain” (TISC) or “disclosure by regulation”—aims to eliminate modern slavery by requiring companies to disclose—and pressuring them to address—potentially exploitative practices in their global supply chains (Christ et al. 2020; Flynn and Walker 2021; Lindsay et al. 2017). Such laws are promoted as a first step toward greater sustainability (Franziska 2019) and have been enacted in an increasing number of jurisdictions, including California (2012), the United Kingdom (2015), Australia (2018) and, more recently, Canada (2023).

The recent proliferation of supply chain regulations worldwide has triggered a corresponding spike in research interest, with mandatory disclosure regulation now a key area of focus within the modern slavery literature (Strand et al. 2024). However, researchers have largely concluded that mandatory disclosure regimes are generally weak and ineffective given their failure to set legally binding standards, thus enabling performative compliance (Bayne et al. 2022; Islam and Van Staden 2022).

Australian corporations, for example, generally do not disclose key performance indicators (Bayne et al. 2022) and remain silent on the effectiveness of their actions (Christ and Burritt 2023). Disclosures made by companies (Mai et al. 2023) and public sector organizations (Rogerson et al. 2020) subject to the 2015 UK Modern Slavery Act are similarly seen as low quality. As Islam and Van Staden (2022) summarize, mandatory reporting regimes have bluntly failed to eradicate modern slavery because these regulations do not require companies to develop tools to detect modern slavery practices or respond to instances once identified. Under these transparency regimes companies are not legally required to “do” anything about slavery; instead, disclosure becomes the ultimate obligation (Mehra and Shay 2016, 464). New (2015) suggests that preventative efforts such as disclosure regimes and supply chain audits are replete with “busy-work” which are in some sense “part of the enabling mechanism for modern slavery to persist [since they] give the appearance of ‘working on the problem’” (p. 703). Indeed, as the modern slavery equivalent of “greenwashing”, the mandatory disclosure approach is criticized for being more symbolic than substantive (Birkey et al. 2018).

Literature focussing on whether, and how, corporate disclosures are “working” mainly adopts a downstream perspective that points to their ineffectiveness at eradicating modern slavery. In line with Crane et al. (2017), who suggest that mandatory disclosure requirements are “part of fragmented, and embryonic governance regimes” (p. 4), we argue that more research focused on the upstream is needed to better understand the policy arena in which disclosure requirements are created, as these crafting processes involve competing ideas held by constellations of actors that shape the possibilities of achieving transformative change (Gustafsson et al. 2023). Adopting an upstream perspective allows modern slavery to be viewed as a public policy issue and gives rise to research questions that seek to understand the different stakeholders involved—how they conceive of and frame the issue of modern slavery in the first place, and how these perspectives are reflected in legislation. This orientation might help us better understand why disclosure regimes are ineffective, and may help stakeholders, including policymakers, investors and NGOs, better understand one another and the varied perspectives on and approaches to modern slavery.

Although prior research studies on stakeholder engagement in global supply chains are limited, several studies have examined NGOs’ proactive collaborations with companies (Brun et al. 2020) and their efforts to influence consumers’ shopping decisions by drawing attention to information contained in corporate disclosures (Prokopets 2014). In relation to regulatory processes, prior research studies identify governments, firms and their suppliers as key stakeholders in mandatory disclosure initiatives but fail to acknowledge that the public policy processes leading to such regulations are themselves multi-stakeholder processes (McLaren et al. 2024; Strand et al. 2024). As a notable exception, Ahmad et al. (2024) analyse the discourse around modern slavery regulations in California, the United Kingdom and Australia and conclude that the regulations were “drafted and enacted in a way that is more likely to serve corporate interests rather than bring social justice globally” (p. 3). We add to this literature by offering a Canadian

perspective that considers stakeholder roles and perspectives in policy-making processes leading to the enactment of modern slavery disclosure regulation.

3 | Framing Theory

Conceiving of modern slavery as a public policy issue leads us to mobilize framing theory as used by public policy researchers. For them, there is a “less visible foundation - an ‘assumptional basis’ - that lies beneath the more visible surface of language or behaviour, determining its boundaries and giving it coherence” (Rein and Schön 1996, 88). This “assumptional basis” relates to frames. Frames are defined as “schemata of interpretation” that allow individuals to organize their understanding of the world to make complex situations intelligible (Goffman 1974). Modern slavery is undoubtedly a complex phenomenon (Davidson 2015), and stakeholders, such as the victims, activists and NGOs, corporations, investors and policymakers can hold varied schemas of interpretation allowing them to make sense of this complex issue. These various schemas—or frames—translate into strong and generic narratives that guide how a given stakeholder analyses and describes a situation and how they think the situation should be acted upon (Rein and Schön 1996).

Rein and Schön (1996) make a distinction between two types of narrative frames: rhetorical frames and action frames. Rhetorical frames serve the function of persuasion, justification and symbolic display to deliberately portray issues in a particular way. A rhetorical frame is what gives the story its appearance of coherence, persuasiveness and obviousness (Schön and Rein 1994). Action frames, by contrast, are those that inform practice (Schön and Rein 1994). They refer to a specific level of commitment to a particular course of action. Action frames give coherence to patterns of action inherent to the issue at stake. Unsurprisingly, rhetorical and action frames influence each other. However, stakeholders might hold similar or different rhetorical and action frames about modern slavery, but it does not necessarily follow that holding a similar rhetorical frame will result in holding a similar action frame.

These rhetorical and action frames are embedded within and shaped by a broader type called metacultural frames. Metacultural frames pertain to broadly shared beliefs, values and perspectives through which a particular stakeholder gives meaning to its thoughts and actions (Schön and Rein 1994). Schön and Rein (1994) give the example of the “nurture frame” which relates to the idea of a public responsibility for the improvement of environmental conditions judged to be conducive to social pathology, which stands in stark contrast with the “nature frame” under which genetics rather influences pathology. Similarly, Canadian stakeholders might hold opposing metacultural frames that give meaning to their thoughts about modern slavery and to the actions they think should be taken to act upon it.

In sum, given that stakeholders can hold varied schemas of interpretation to make sense of modern slavery, framing theory is well suited to aid in interpreting their understanding of the

phenomenon. Therefore, this paper draws on the work of Donald Schön and Martin Rein to focus on three different types of frames—rhetorical frames, action frames and metacultural frames—to make sense of the way Canadian stakeholders conceive of the controversial issue of modern slavery and the appropriate actions that should be undertaken to deal with it.

4 | Methodology

4.1 | The Canadian Regulatory Context

In 2018, Bill C-423 (Modern Slavery Act) was introduced by Liberal Member of Parliament John MacKay. This bill was proposed in response to a parliamentary report entitled *A call to action: ending the use of all forms of child labour in supply chains*, that was issued by the Subcommittee on International Human Rights of the House Committee on Foreign Affairs and International Development (SDIR) and which received cross-party support. To prepare this report, the SDIR heard testimonies, mainly from NGOs. The bill was subject to a first reading in the House of Commons but subsequently “died” on the Order Paper following the dissolution of Parliament in Sept 2019. Bill S-211 (Fighting Against Forced Labour and Child Labour in Supply Chains Act) was later introduced in 2021 by Independent Senator Julie Miville-Dechéne. This bill was subject to Senate first, second and third readings and was transferred to the Senate Committee on Human Rights (SCHR). The SCHR heard from a series of witnesses in the course of its activities and prepared the report that was eventually accepted. The issue then passed in the hands of the House (of Commons) Committee on Foreign Affairs and International Development; the legislation took effect on January 1st, 2024. In this study, we focus on the period during which the debates took place (from 2017 to 2022), that is *before* the proposed legislation was transferred to this last committee.

4.2 | Stakeholder Groups

NGOs are one of the stakeholder groups that we consider in this study. Victims, though the focus of the modern slavery eradication efforts, are difficult to reach for research purposes. In public policy debates, NGOs can be viewed as a voice for victims of contemporary societal phenomena (Tzvetkova 2002). According to Crane (2013), NGOs can play a nontrivial role in the modern slavery debate by investigating and publicizing instances of slavery. Indeed, media coverage² prompts efforts into addressing modern slavery issues (Geng et al. 2022). NGOs also put pressure on regulators (Crane 2013). Indeed, Islam and Van Staden (2022) report that NGOs played an important role in bringing about the UK Modern Slavery Act. Hence, we view NGOs as carriers of victims’ voices. Institutional investors are also a nontrivial stakeholder group that we take into consideration. Institutional investors play significant roles in the functioning of capital markets, including exerting disciplinary effects on corporate behaviour (Roberts et al. 2006). As Cockayne (2021) explains, financial sector actors are well positioned

to contribute to tackling modern slavery. Canadian institutional investors are thus in a position to act on modern slavery and their views on this phenomenon are of interest to our study. Corporate activities are the primary sites of modern slavery and as such, corporations are an additional essential stakeholder group. Multinational corporations (MNCs) often contribute to the persistence of modern slavery because of the regulatory challenge they present to states and their insufficient surveillance of supply chains (Burmester et al. 2019). Organizing and governing global value chains might present true challenges for businesses, but modern slavery can also be encouraged by a business case that clearly encourages the use of slave labour (Stringer and Michailova 2018). Only Canadian businesses, specifically those that have international activities taking place in global supply chains, will be considered for the purpose of our investigation. Finally, Canadian policymakers are another stakeholder group that we consider in this study. In our case, policymakers are those Canadian individuals (parliamentarians and senators) and committees (SDIR, SCHR) that were involved in bills C-423 and S-211. Policymakers are important stakeholders because they are in control of introducing legislation to act on modern slavery (Lindsay et al. 2017).

4.3 | Data Sources

According to Rein and Schön (1996), researchers can discover rhetorical and action frames from relevant texts used in policy debates with the intent to persuade or justify. These texts can take various forms, for instance speeches, memoranda, or essays (Rein and Schön 1996), as well as text found on websites (Jose and Lee 2007). For their part, metacultural frames follow directly from the analysis of the rhetorical and action frames. Here, the researcher strives to find the broader views within which these rhetorical and action frames are embedded (Schön and Rein 1994). The aim becomes to find the encompassing beliefs that tie together the way a given actor envisions the public policy issue, and the actions they think should be deployed to work on it.

To uncover NGOs’ frames, we scrutinize the text of the testimonies or briefs of the 12 NGOs that were heard by the legislative committees (SDIR and/or SCHR) and the briefs of two additional NGOs that could be found online. To get a deeper understanding of how they conceive of modern slavery and what should be done about it, we also scrutinize the content of their respective websites devoted specifically to modern slavery. This gave us insights into the frames of 14 Canadian NGOs in total.

To explore institutional investors’ frames, we analysed the text of the testimony of the investor association that was heard by the SCHR and the relevant content from its website. To get the views of individual institutional investors, we also scrutinized the website content of 14 institutional investors. This number of organizations was chosen to match the number of NGOs composing our sample. These 14 institutional investors comprised the seven largest Canadian institutional investors

and seven largest Canadian money managers.³ We selected the largest Canadian institutional investors because they can reasonably be expected to be the most up-to-date and well-resourced, in terms of tools and approaches to tackle social matters such as modern slavery.

To identify the corporate frames, we investigated the text of the testimonies of the three industry associations and one company representative that were heard by the legislative committees (SDIR or SCHR). For the same reason mentioned above, we also read the content of their websites related to modern slavery. However, this provides little understanding of how individual companies frame modern slavery. Hence, we also scrutinized the website content of 14 large Canadian companies included in the S&P/TSX Composite Index. The companies were selected⁴ according to two criteria: they have international operations through global supply chains, and they operate in sectors considered to be high-risk for modern slavery, for instance financial services, mining, construction and property, food, beverage and agriculture, garment industry, meat works and manufacturing (Australian Council of Superannuation Investors (ACSI) 2019; Kindle 2019; Walkfree 2023). We selected 14 companies to match the number of NGOs and institutional investors forming part of our sample.

Finally, to explore the Canadian policymakers' frames, we analysed the text of (1) the speeches pronounced at the Senate and in the House of Commons by the politicians that led the modern slavery initiatives, (2) the related discussions by parliamentarians and senators, (3) reports prepared by legislative committees in charge of the policy matter and (4) the proposed legislation. Table 1 presents the individuals, committees and organizations that make up our sample and the data sources for each stakeholder group.

4.4 | Data Analysis

Our data analysis aimed to identify what gives the above-mentioned texts their appearance of coherence, persuasiveness and obviousness (rhetorical frames); what gives the patterns of actions discovered in these same texts their appearance of coherence (action frames) and the overarching level conceptions that shape these rhetorical and action frames (metacultural frames) (Rein and Schön 1996). The following approach was undertaken to perform our analysis.

We imported all empirical material into NVivo, a qualitative research tool that allows us to handle sparse and unstructured qualitative information. Word and PDF files can easily be imported in NVivo. For website content, the NCapture feature of this software enables web content and online PDF documents to be captured and imported into the software. The data was organized by stakeholder group in the software. In a first step, we proceeded with an open coding exercise (Strauss and Corbin 1998) through a careful reading of the material. This exercise aimed at performing a first-order analysis, under which we strived to identify emerging categories. As the analysis progressed, we started looking for similarities and differences in terms of considerations, values and goals among the many categories identified to reduce their

number. In doing so, we also distinguished categories that related to rhetorical framing from those that related to action framing. These broader categories appear on the left side of Table 2. For instance, for NGOs, some of these broader categories that related to rhetorical framing include “definition/examples/causes” and “omnipresence and hidden nature”, whereas others that related to action framing include “advocacy” and “corporate training”. In a second step, we sought to organize first-order categories into broader unifying ones, asking ourselves whether the emerging themes suggested notions and ideas that might help us describe the beliefs held by stakeholders about modern slavery and the actions to work upon it. These second-order themes were labelled with our own phrasal descriptors and represented the rhetorical frames and action frames that we drew from the empirics. For instance, for NGOs (Table 2, Panel A), the second order themes that we identified are “demonization” and “eradication.” These second-order themes were related to groups of first-order categories displaying rhetoric or actions. In a third step, we then worked to distill the emergent second-order themes—the rhetorical and action frames—into broader aggregate dimensions, which correspond in our case to metacultural frames. For instance, for NGOs (Table 2, Panel A), we labelled the metacultural frame a “community” frame. Several discussions between the authors took place to agree on the categories composing the first- and second-order themes, as well as the aggregate dimensions. A structure of first-order themes, second-order themes and aggregate dimensions was prepared for each category of stakeholders, allowing us to discover and compare the frames held by our four stakeholder groups (Table 2).

5 | Results

This section presents the frames held by each of our four stakeholder groups in turn. For each group, we first identify the emergent rhetorical frames, then the emergent action frames and finally the metacultural frames within which we consider the rhetorical and action frames to be embedded.

5.1 | NGOs—Demonizing and Eradicating

We label the rhetorical frame mobilized by NGOs in their communications on the subject of modern slavery a “demonization” frame (Table 2, Panel A). Through their narratives, NGOs point to the “evil” of modern slavery and the atrocities it has caused. They demonize it in unsettling definitions and disturbing examples, and by discussing its root causes, highlighting its omnipresent yet hidden nature and providing deplorable statistics and devastating stories. For instance, the first quote below defines modern slavery as a crime prevailing in all countries; the second makes clear that Canada is no exception.

Modern slavery is an umbrella term encompassing human trafficking, forced labor, debt bondage, forced child labor, forced marriage, and commercial sexual exploitation. It is a crime of economic opportunity that exists in every country.

(Global Fund to End Modern Slavery)

TABLE 1 | Stakeholders and data sources by groups.

Stakeholder group	Individual(s), committee, or organization/source(s) of written texts
Policymakers	<p>Liberal MP John MacKay/Speeches pronounced in the House of Commons (HC)</p> <p>Parliamentarians of the House of Commons/Discussions at HC SDIR/Committee report</p> <p>Independent Senator Julie Miville-Dechéne/Speeches pronounced at Senate and Standing Senate Committee on Human Rights Senators/Discussions at Senate</p>
NGOs	<p>Amnesty International Canada/Brief submitted to SDIR and website content (https://www.amnesty.ca/?gclid=EAIaIQobChMI3uKn39zE-gIVerbICh2UHQ_3EAAYASAAEgJrG_D_BwE, captured 3 October 2022)</p> <p>Anti-Slavery International/Testimony at SDIR committee and website content (https://www.antislavery.org/, captured 29 September 2022)</p> <p>Canadian Labour Congress/Brief submitted to SDIR and website content (https://canadianlabour.ca/, captured 3 October 2022)</p> <p>Canadian Network on Corporate Accountability/Testimony at SCHR committee and website content (https://cnca-rcrc.ca/about-us/what-we-do/, captured 29 September 2022)</p> <p>Ethical Trading Initiative/Testimony at SDIR committee and website content (https://www.ethicaltrade.org, captured 30 September 2022)</p> <p>Global Fund to End Modern Slavery/Testimony at SCHR committee and website content (https://www.gfems.org/, captured 30 September 2022)</p> <p>Human Rights Watch/Testimony at SDIR committee and website content (https://www.hrw.org/, captured 30 September 2022)</p> <p>International Justice Mission Canada/Testimony at SDIR committee and website content (https://www.ijm.ca/, captured 30 September 2022)</p> <p>International Labour Organization/Testimony at SDIR committee and website content (https://www.ilo.org/, captured 30 September 2022)</p> <p>The Freedom Fund/Testimony at SDIR committee and website content (https://freedomfund.org/, captured 30 September 2022)</p> <p>UNICEF Canada/Testimony at SDIR committee and website content (https://www.unicef.ca/en, captured 03 October 2022)</p> <p>UN Working Group on Business and Human Rights/Testimony at SCHR committee and website content (https://www.ohchr.org/en/special-procedures/wg-business, captured 03 October 2022)</p> <p>Walk Free Foundation/Testimony at SDIR committee and website content (https://www.walkfree.org/, captured 03 October 2022)</p> <p>World Vision Canada/Testimonies at SDIR and SCHR committees and website content (https://www.worldvision.ca/, captured 03 October 2022)</p>
Corporations (Industry associations)	<p>Mining Association of Canada/Testimony at SCHR committee and website content (Towards Sustainable Mining at https://mining.ca/towards-sustainable-mining/, captured 13 October 2022)</p> <p>Canadian Chamber of Commerce/Testimony at SCHR committee and website content (https://chamber.ca/, captured 13 October 2022)</p> <p>Retail Council of Canada/Testimony at SCHR committee and website content (Supply Chain & Logistics at https://www.retailcouncil.org/community/supply-chain-logistics, captured 13 October 2022)</p>
Corporations (Individual companies)	<p>Aecon Group (Construction)/Website content (2021 Sustainability Report at https://www.aecon.com/our-company/sustainability/sustainability-strategy, captured 11 October 2022)</p> <p>Canadian Natural Resources Limited (Oil and gas)/Website content (2021 Stewardship Report to Stakeholders and 2021 ESG/Sustainability reporting at</p>

(Continues)

TABLE 1 | (Continued)

Stakeholder group	Individual(s), committee, or organization/source(s) of written texts
	<p>https://www.cnrl.com/corporate-responsibility/sustainability-reporting#2020 and Statement of Human Rights at https://www.cnrl.com/about-cnq/code-of-conduct-&-human-rights, captured 11 October 2022)</p> <p>Celestica Inc. (Electronics Manufacturing)/Website content (Sustainability Report 2021 at https://www.celestica.com/about-us/sustainability/sustainability-reporting and Modern Slavery Statement and Child Labor Prevention Policy at https://www.celestica.com/about-us/corporate-governance/compliance-and-ethics, captured 13 October 2022)</p> <p>Centerra Gold (Mining)/Website content (2021 ESG Report at https://sustainability.centerragold.com/transparency-hub, ESG Reporting approach at https://sustainability.centerragold.com/governance/esg-reporting-approach and Human Rights at https://sustainability.centerragold.com/social/human-rights, captured 11 October 2022)</p> <p>Empire Company (Food retail)/Website content (2022 Sustainable Business Report at https://sobeysbreport.com/, captured 13 October 2022)</p> <p>Equifruit (food distributor)/Testimony at SCHR committee and website content (Sustainability at https://equifruit.com/en/sustainability, captured 13 October 2022)</p> <p>Loblaw Companies Limited (Food and garment retailer)/Website content (Our position on human rights and 2021 ESG Report at https://www.loblaw.ca/en/responsibility, captured 12 October 2022)</p> <p>Magna International (Auto parts manufacturing)/Website content (2021 Sustainability Report at https://www.magna.com/company/sustainability and Modern Slavery Statement at https://www.magna.com/company/investors/financial-reports-public-filings/tax-other-reports, captured 12 October 2022)</p> <p>Maple Leaf Food Inc. (Consumer packaged goods - food)/Website content (2021 Sustainability Report and 2021 ESG Index at https://www.mapleleaffoods.com/sustainability%20-report/better-communities/ethical-business-conduct/, captured 12 October 2022)</p> <p>MTY Food Group (Food/Restaurants)/Website content (https://mtygroup.com/pratiques-de-gouvernance/, captured 12 October 2022)</p> <p>Nutrien Limited (Agriculture)/Website content (2022 ESG Report at https://www.nutrien.com/sustainability/strategy, captured 12 October 2022)</p> <p>Royal Bank of Canada (Financial services)/Website content (2021 ESG Performance Report, Human Rights Position Statement and Modern Slavery Act Statement at https://www.rbc.com/community-social-impact/reporting-performance/index.html, captured 12 October 2022)</p> <p>Saputo Inc. (Consumer packaged goods - food)/Website content (Responsible Sourcing at https://www.saputo.com/en/our-promise/responsible-sourcing, captured 12 October 2022)</p> <p>SNC-Lavalin Group Inc. (Construction)/Website content (2021 Sustainability Report and 2021 GRI Report at https://www.snclavalin.com/en/priorities/sustainability/sustainability-report, Modern Slavery Statement and Human Trafficking Statement at https://www.snclavalin.com/en/site-services/statutory-and-regulatory-disclosures, captured 12 October 2022)</p> <p>Yamana Gold Inc. (Mining)/Website content (2021 Sustainability Report at https://www.yamana.com/English/responsibility/responsibility-reports/default.aspx, captured 12 October 2022)</p>
Institutional investors (Association)	<p>Shareholder Association for Research & Education (SHARE)/Testimony at SCHR committee and website content (Human Rights at https://share.ca/our-impacts/human-rights/ and Shareholders Engagement at https://share.ca/our-services/shareholder-engagement/, captured 11 October 2022)</p>

(Continues)

TABLE 1 | (Continued)

Stakeholder group	Individual(s), committee, or organization/source(s) of written texts
Institutional investors (Individual organizations)	<p>Alberta Investment Management/Website content (Responsible Investment Policy (2020) at https://www.aimco.ca/what-we-do/responsible-investing, and Responsible Investment Trends at https://www.aimco.ca/insights/responsible-investment-trends captured 6 October 2022)</p> <p>BlackRock Asset Management Canada Ltd/Website content (BlackRock ESG Integration Statement (2022) at https://www.blackrock.com/us/individual/literature/publication/blk-esg-investment-statement-web.pdf and Making sustainability our standard (2020) at https://www.blackrock.com/corporate/literature/publication/esg-integration-approach.pdf, captured 6 October 2022)</p> <p>British Columbia Investment Management Corporation/Website content (2021 ESG Annual Report at https://uberflip.bci.ca/i/1474754-2021-esg-annual-report/0, captured 6 October 2022)</p> <p>Brookfield Asset Management/Website content (“Our Investment Approach”, in 2021 ESG Report at https://www.brookfield.com/sites/default/files/2022-07/bam_esg_report_2021_final_2.pdf, captured 7 October 2022)</p> <p>Caisse de dépôt et placement du Québec/Website content (2021 Sustainable Investing Report at https://www.cdpq.com/en/approach/sustainable-investing/socialF and other website content at https://www.cdpq.com/en/tobacco-free-portfolios, captured 7 October 2022)</p> <p>Canada Pension Plan Investment Board/Website content (2022 Report on Sustainable Investing at https://www.cppinvestments.com/the-fund/sustainable-investing, captured 7 October 2022)</p> <p>Fiera Capital Corp/Website content (Responsible Investment Policy 2017 at https://www.fieracapital.com/sites/default/files/Responsible%20Investment%20Policy_0.pdf, 2020 Responsible Investment Report at https://www.fieracapital.com/wp-content/uploads/insights/3671/2020-fiera-capital-esg-responsible-investment-report.pdf and Sustainability Risk Policy 2021 at https://uk.fieracapital.com/wp-content/uploads/default/20210330/sustainability-risk-policy.pdf, captured 7 October 2020)</p> <p>Healthcare of Ontario Pension Plan/Website content (Statement of Investment Policies & Procedures 2022 at https://hoopp.com/docs/default-source/investments-library/policies-agreements/hoopp-statement-investment-policies-procedures.pdf?sfvrsn=4 and Sustainable Investing Policy 2022 at https://hoopp.com/docs/default-source/investments-library/policies-agreements/hoopp-responsible-investing-policy.pdf?Status=Temp&sfvrsn=fd609b16_16, captured 7 October 2022)</p> <p>Manulife Investment Management/Website content (Sustainable and responsible investing report 2021 at https://www.manulifeim.com/retail/ca/en/sustainable-investing, captured 7 October 2022)</p> <p>MFS Investment Management Canada/Website content (2021 Sustainable Investing Annual Report at https://www.mfs.com/en-ca/institutions-and-consultants/insights/sustainable-investing/sustainable-investing-annual-report/diversity-equity-inclusion-at-mfs.html, captured 11 October 2022)</p> <p>OMERS Ontario Municipal Employees Retirement System/Website content (Sustainable Investing Policy at https://www.omers.com/sustainable-investing-policy and ESG at OMERS at https://www.omers.com/esg-at-omers, captured 7 October 2022)</p> <p>Ontario Teachers' Pension Plan/Website content (Annual Responsible Investing and Climate Strategy Report 2021 at https://www.otpp.com/en-ca/about-us/our-impact/responsible-investing-report/, captured 7 October 2022)</p> <p>PH&N Institutional (RBC Global Asset Management Inc.)/Website content (Our approach Responsibly invested at https://institutional.rbcgam.com/en-ca/responsible-investment/our-approach including the 2021 Corporate</p>

(Continues)

TABLE 1 | (Continued)

Stakeholder group	Individual(s), committee, or organization/source(s) of written texts
	Governance and Responsible Investment Annual Report, captured 7 October 2022)
	TD Asset Management/Website content (Sustainable Investment Report 2021 at https://www.td.com/ca/en/asset-management/institutional/ , captured 11 October 2022)

Canada is not immune to these abhorrent practices [...]. Migrant workers under Canada’s Temporary Foreign Worker Program (TFWP) are especially at risk [...]. Due to extreme vulnerability and power imbalances, migrant workers may be tricked into signing contracts they cannot understand or may come to Canada with the understanding that there is a job when there is none or there is a completely different—and often illegal—job. Far too often, migrant workers face intimidation by their employer and/or labour broker, including the retention of workers’ passports and work permits, workplace reprisals, the withholding of pay, wage theft from illegal deductions, sexual harassment, and the constant threat of being reported to immigration officials or the Canada Border Services Agency. Some are coerced into debt bondage by their employer and/or labour broker, which takes years to repay.

(Canadian Labour Congress)

NGOs emphasize that corporations often claim to be unaware of modern slavery in their supply chain. This invisibility, it can then be argued, makes the evil more wicked—and more difficult to combat. NGOs frequently challenge such argument:

There are a number of high-profile cases where it is argued that the companies involved should have been aware that forced labour was being used in their operations. One of these cases involves a Canadian company, Nevsun Resources, which owns and operates 60 percent of the Bisha gold, copper and zinc mine in northwest Eritrea. Dozens of Eritreans have now joined a historic civil action in Canada, alleging they experienced forced labour, horrendous working conditions and a climate of fear and intimidation. This case is unique not because of the allegation of forced labour, but because of the fact that it was brought to light and made its way to Canadian courts. Most cases of forced labour either remain hidden or, if exposed, are not brought to court due to a range of legal, logistical, and financial barriers.

(Canadian Labour Congress)

By highlighting an exceptional case, this quote draws attention to the more common occurrence wherein modern slavery

remains “hidden,” and difficult to litigate, thus adding to its demonization. Shocking statistics and moving stories are also frequent in NGOs’ narratives, which contribute further to the demonization:

There are 152 million children [...] in child labour today. Seventy-three million of these children are in hazardous work. This is work that is likely to jeopardize their health, safety, or morals. Sixty-nine per cent of children who are in child labour are contributing family workers.

(International Labour Organization)

Tania [...] is 15 years old. She works in southern Bangladesh’s shrimp processing industry. She works eight hours a day. She is the sole provider for her family. She often works overnight shifts peeling piles of ice-cold shrimp in a dark room, only to return home to do a full day’s work. The fact is that Canadians may well be consuming that shrimp. We imported 163 million dollars’ worth of shrimp from countries in Southeast Asia with known child labour problems. Like child labourers elsewhere, Tania is missing out on school. She is putting her health and well-being at risk, and as a girl she is particularly vulnerable to issues of abuse and violence in the workplace.

(World Vision Canada)

Consistent with their rhetorical frame, we label the action frame evoked in NGOs’ narratives as an “eradication” frame (Table 2, Panel A). The unequivocal goal of their actions, as depicted in their narratives, is to bring an end to modern slavery and they work on various fronts to achieve this. Common actions undertaken to eradicate modern slavery include participating in joint initiatives, advocating for the vulnerable, building corporate awareness (through training and advisory service), developing standards and preventing, detecting, rehabilitating, prosecuting and denouncing modern slavery in all its forms. For instance, in terms of advocacy, the NGOs describe how they campaign for stronger legislation:

We recognise that current laws, including the UK Modern Slavery Act, are not enough to end slavery abuses in global supply chains. [...] Decades of voluntary “corporate social responsibility” initiatives have so far failed to protect people across the world

TABLE 2 | Stakeholders' frames.

1st order themes	Rhetorical frames/Action frames (2nd order themes)	Metacultural frame (aggregate dimension)
Panel A: NGOs		
Definition/Examples/Causes	Rhetorical frame: Demonization	Community frame
Omnipresence/Hidden nature		
Statistics and stories		
Negative effects		
Advocacy	Action frame: Eradication	
Corporate responsabilization		
Standardization		
Joint initiatives		
Prevention/Detection/Rehabilitation		
Prosecution/Denunciation		
Canada's commitment to human rights	Rhetorical frame: Eradication	
Legislation elsewhere	(Need for eradication-oriented legislation)	
Due diligence		
Prevention/Identification/Remediation		
Sanctions		
Panel B: Institutional investors		
PRI	Rhetorical frame: Risk	Market frame
Risk/Return	(Modern slavery as risk category)	
Materiality		
Advocacy	Action frame: Risk	
Joint initiatives	(Assessing modern slavery risk)	
ESG research and metrics		
Monitoring investees		
Exclude/Exit		
Reporting legislation not effective	Rhetorical frames: Risk	
Due diligence legally required	(Assessing modern slavery risk)	
Panel C: Corporations		
Human rights principles	Rhetorical frame: Risk	Market frame
Risks	(Modern slavery as a risk category)	
Materiality		
Sustainability corporate policies	Action frame: Risk (Attention	
Training	given to modern slavery	
Supply chain monitoring	risk - symbolic vs. substantive)	
Modern slavery statements		

(Continues)

TABLE 2 | (Continued)

1 st order themes	Rhetorical frames/Action frames (2 nd order themes)	Metacultural frame (aggregate dimension)
Panel D: Policymakers		
Definition/Examples/Causes	Rhetorical frame: Demonization	Market frame
Omnipresence/Hidden nature		
Statistics and stories		
Canada's commitment to human rights		
Content of report	Action frame: Reporting	
Legislation elsewhere		
First step and compromise		
Transparency not eradication		
Sanctions (including Name & Shame)		

from modern slavery. [...] Which is why we campaign for national and international laws that would make businesses legally responsible for preventing human rights abuses in their supply chains and provide access to justice for victims.

(Anti-Slavery International)

NGOs' action frames converge towards eradication by highlighting how they work to prevent, detect and rehabilitate victims and prosecute offenders. Through these actions, NGOs engage in the fight against modern slavery before (preventing), while (detecting) and after (rehabilitating and prosecuting) it takes place. Prevention takes various forms, one of which is raising awareness about the issue of modern slavery. In the eyes of NGOs, fighting against modern slavery starts with the facts, hence their emphasis on detection. By conducting and publishing research, they document the existence of modern slavery, its causes, effects and the various locations and circumstances where it takes place. The body of knowledge thus produced is meant to inform policy debate and decision-making in various fields and situations. Research can take different forms such as surveys and interviews and be published in several ways such as reports, journal articles and directories. For instance:

Human Rights Watch has conducted research on child and forced labour in global supply chains for over two decades. We've interviewed thousands of workers, employers, government officials, and other affected individuals in the context of global supply chains in agriculture, the garment and footwear industry, fishing, mining, and construction. [...] We have documented hazardous child labour associated with a range of crops and products that are sold on the international market, including sugar cane from El Salvador, bananas from Ecuador, cotton from Egypt

and Uzbekistan, and fruits and vegetables from the United States and from Israel.

(Human Rights Watch)

Given the hidden nature of the phenomenon, it sometimes becomes necessary to go on site to verify the conditions under which work is performed. Thus, NGOs conduct site visits to detect instances of modern slavery. Under an eradication frame, preventing and detecting modern slavery is not sufficient, victims must also be freed and rehabilitated. Freeing enslaved people is the first step in a long process to full rehabilitation. NGOs, hence, not only rescue victims but they also support them in rebuilding new lives, empower them to find and develop their own capabilities, and help them develop their resilience to avoid re-victimization. Victims are provided with various forms of assistance: medical, psychological, social, legal, educational, vocational and financial. For instance:

We help people escape from slavery and rebuild their lives as free people. We provide initial financial support and shelter, we provide a basic education training for both children and adults since they cannot access state education, even after escape, due to the lack of birth certificates. We also help survivors into longer term vocational training and provide microloans so they can become financially independent. We support many in releasing family members who are still in slavery.

(Anti-Slavery International)

Finally, by denouncing issues of modern slavery and assisting victims in the prosecution of perpetrators, the work of NGOs further contributes to eradication. Their view is that when regulations against modern slavery are enforced and wrongdoers denounced and brought to court, it not only provides victims with compensation but also produces dissuasion. For instance:

In a landmark ruling, the Supreme Court of Canada has decided that a human rights lawsuit against a Vancouver-based mining company can be heard in British Columbia, and not Eritrea where the human rights abuses allegedly occurred. The Eritrean plaintiffs say they were forced to work in a gold, copper and zinc mine largely owned by Nevsun Resources. [...] This ground-breaking decision sends a clear message to Canadian corporations that they can and will be held accountable for alleged human rights abuses overseas [...]

(Amnesty International)

All NGOs' actions aiming at eradication support their rhetorical frame that demonizes modern slavery. They view modern slavery as an atrocity that needs to be eliminated. Most NGOs disagree with the proposed Canadian legislation. For them, reporting (transparency) legislation is ineffective in tackling modern slavery because it does not create any requirements to prevent, identify and remedy, echoing Islam and Van Staden's (2022) finding. NGOs call for due diligence requirements, similar to those found elsewhere in more stringent regulations:

Three leading pieces of mandatory due diligence legislation are the French Duty of Vigilance Law, the Dutch Child Labour Due Diligence Law and the US Trade Facilitation and Trade Enforcement Act. Although each of these examples vary in their scope and methods [...], this approach puts the onus on companies to demonstrate that they are taking all necessary measures to identify, prevent, and mitigate incidences of modern slavery.

(Canadian Labour Congress)

Thus, they expect policymakers to genuinely work towards eradication by requiring businesses to monitor their supply chain to identify instances of modern slavery, remedy the situation when such instances are found, and prevent modern slavery from (re)occurring. Only then can we speak of eradication. In the views of NGOs, businesses should then report on the results of their due diligence process and be penalized for noncompliance.

Our empirical data suggests NGOs hold a metacultural frame that can be labelled a "community" frame (Table 2, Panel A). NGOs promote community values. They demonize modern slavery which they depict as an atrocious violation of human rights. They undertake actions to eradicate the phenomenon as much as they can, calling for stronger laws to help in achieving this goal. Victims are the cornerstone of their rhetoric and actions. In the words of Schön and Rein (1994), this community frame well describes the broadly shared beliefs, values and perspectives through which NGOs give meaning to their thoughts and actions in relation to modern slavery.

5.2 | Institutional Investors—"Riskizing" Modern Slavery

Although most institutional investors specifically mention the issue of modern slavery in their investment policy or sustainable investing report (nine out of 14), others (the remaining five) say nothing explicit about it, perhaps because it is included in the broader "social" aspect of environmental, social and governance (ESG). All institutional investors included in our analysis are proud to say they adhere to responsible investment philosophies, for instance by communicating their commitment to the United Nations Principles for Responsible Investment (PRI) (Principles for Responsible Investment (PRI) 2022). Signing the internationally recognised PRI signals a public commitment to include ESG factors in investment decision making and ownership. Indeed, PRI urges investors to use responsible investment to improve returns and better manage risks (Principles for Responsible Investment (PRI) 2022), notably by incorporating ESG, and arguably modern slavery issues, in risk management. Institutional investors adopt a rhetorical "risk frame" (Table 2, Panel B) when they discuss modern slavery, conceiving of modern slavery as a risk category:

During 2020, one of our ESG research analysts produced in-depth research on the risks of modern slavery in the supply chain of retailers, consumer staples brands and other impacted industries. The potential risks relating to modern slavery are increasing due to regulatory activity, increasing consumer awareness of the issue and growing investor interest in ESG in general. These factors are likely to result in various financial impacts, supply chain disruptions, fines or lowered valuations for companies that cannot effectively manage this risk.

(MSF)

Paradoxically, in institutional investors' view, it is not the existence of modern slavery per se that increases the risk. Rather, it is that consumers and investors are becoming increasingly aware of and preoccupied with the phenomenon, and that governments are paying closer attention to it. They do not demonize modern slavery as NGOs do, they "riskize" it. The above quote then identifies how modern slavery risks can negatively affect investees' returns, namely through fines and losses related to supply chain disruptions. If investees do not adequately manage modern slavery risks, they may in turn suffer from lower valuations. Institutional investors are concerned with the lower returns resulting for investees because of fines imposed by government for nonconformance with labour regulation. In other words, institutional investors are concerned about the potential negative impact of modern slavery on corporate financials. This difference may be explained by the fact that institutional investors and NGOs have different interests. The former are more preoccupied with the financial interests of the investors they represent, whereas the latter are more concerned with the well-being of the victims they advocate for.

Materiality plays an important role in institutional investors' rhetorical risk frame. For them, modern slavery, like any other risk category, needs to be taken into consideration when it may significantly affect the investee's performance. Again, it is not the impact on the victims, but rather the potentially material financial impact ensuing from negative consumer sentiment, fines, sanctions, investigations and litigation that makes modern slavery a significant risk factor.

In line with their rhetorical frame, institutional investors' action frame can be seen as a "risk" frame (Table 2, Panel B). Indeed, the various actions described in their narratives converge towards risk assessment. Several institutional investors mention that they engage in advocacy to influence public policy. Such advocacy aims to contribute to public policy outcomes that will help them better assess investees' modern slavery risk. As argued in relation to Canada's proposed modern slavery act:

What's missing for us has been the standardization we can point to say that this is the expectation. It's not something we're just coming up with on our own or that the next investor that comes in is going to have a different point of view. This is where we're going and this is what is expected, and if we don't see reporting and due diligence to the depth required here, we know that's going to be a material risk for you as a company and therefore for us as investors.

(SHARE)

Here, legislation is presented as something that standardizes expectations. It gives institutional investors the basis against which modern slavery risk can be assessed.

Institutional investors also participate in joint initiatives to be on the same page with other investors in terms of expectations and consequently in terms of setting the bar against which risk will be assessed. Furthermore, conducting research, developing ESG metrics and mobilizing external ESG ratings are all additional actions undertaken by institutional investors to assess the risk associated with sustainability issues, including modern slavery risks. In addition, by actively engaging with investees and monitoring them, institutional investors continuously assess sustainability risk. This engagement begins with the due diligence process before the investment is made and continues post-acquisition:

Engagement to promote improved management of sustainability-related factors to enhance long-term outcomes in the companies and assets in which we invest is an essential part of both our diligence and monitoring processes when these factors matter to the business. Since these considerations can significantly affect our assessment of a company's risk profile and value, they are critical in determining the attractiveness of a potential investment and how we can best manage an asset once acquired.

(Canada Pension Plan Investment Board)

Specifically in terms of assessing modern slavery risk, our data shows that subsequent monitoring takes place at two levels. First, associations of institutional investors can represent their members and put pressure on investees to make sure they address this risk:

Each year, on behalf of our clients, we engage in dialogue with boards and management at over 120 Canadian and international companies on behalf of their shareholders, in which case, we would be asking boards or management to take action on a range of material issues for us, which would include human rights impacts [...].

(SHARE)

Ongoing discussions are not only undertaken individually by institutional investors who monitor investees on a regular basis, but also upon their clients' requests, which confirms the idea discussed above that modern slavery risk matters for institutional investors when it matters for their clients.

As modern slavery "becomes relevant", institutional investors' due diligence and subsequent monitoring processes are adapted to specifically incorporate procedures to appropriately capture modern slavery risk. For instance, the following institutional investor indicates specific steps analysts and portfolio managers should undertake to this end:

Evaluating proprietary research produced by our internal ESG experts on modern slavery risks; Analyzing which companies are likely to be engaged in activities or industries that commonly face modern slavery issues; Making use of our in-depth security- and sector-level expertise by evaluating the sustainability reports and corporate policies of potentially impacted companies to assess the strength of their efforts to eradicate modern slavery in their operations and supply chains; Incorporating the views of organizations that are experts in this area, such as Know the Chain, into the research process; Engaging with company management teams about the risk and the company's efforts to combat modern slavery; Modeling and valuing modern slavery risks that we identify as material to the business case of the companies we own [...]

(MSF)

Proxy voting is another mechanism through which institutional investors engage with investees. Proxy votes are used to influence investees' practices related to modern slavery to meet clients' expectations. Institutional investors will use proxy voting if an investee is not acting in the best interest of investors. Finally, in terms of actions, our data indicates that institutional investors will "exclude" or "exit" if an investee persists in inadequately managing its modern slavery risk.

In sum, institutional investors' rhetorical and action frames both reflect a risk frame. Institutional investors talk about modern

slavery as a risk category that matters if it is potentially material in financial terms. Modern slavery issues can engender potential additional costs related to loss of reputation, litigation, fines and production interruption. If these risks are not managed as client investors would expect, they may become financially significant. To support modern slavery risk assessment, institutional investors advocate, participate in joint initiatives, conduct research, develop metrics and monitor investees. Ultimately, they could exclude a potential investee upon due diligence—or exit the investment—if modern slavery risk is not managed in line with expectations.

Given that institutional investors' rhetorical and action frames are all geared toward risk, it is not surprising to find them signalling their disagreement with the proposed Canadian legislation. As mentioned above, institutional investors praise the existence of legislation that sets up expectations against which risk can be assessed. In other words, a mere reporting regime is not enough:

Bill S-211 only requires that companies file reports; it does not create human rights due diligence expectations for businesses. [...] Investors know all too well that there are companies that already answer queries on human rights by pointing to vague public statements or boilerplates that don't provide nearly enough information for investors to assess the quality of the company's approach to managing human rights risks. Legislation should actually require companies to identify, prevent and mitigate these risks.

(SHARE)

Institutional investors' argument is based on an apparent lack of information to sufficiently assess modern slavery risks. An adequate risk assessment requires more information about the ways the company identifies, prevents and mitigates modern slavery issues. We can thus conclude that overall, institutional investors' rhetorical and action frames all reflect a risk frame (Table 2, Panel B).

The empirics presented above demonstrate that institutional investors adhere to a metacultural frame which we label a "market" frame. By focussing on modern slavery risk, institutional investors respond to the market's call for sustainable investment:

The market is at the front end of a significant reallocation of capital towards sustainable investing, which we believe will result in a flow of capital towards issuers and assets with positive sustainability characteristics (and away from those with negative ones). This in turn will also impact the relative pricing of risk and assets in portfolios.

(BlackRock)

The broadly shared beliefs, values and perspectives through which institutional investors give meaning to their thoughts and actions in relation to modern slavery all converge to risk

assessment. They talk about modern slavery as a risk category that needs to be incorporated into their dis(investment) decisions in order to meet investors' expectations. Institutional investors' actions are meant to incite investees to manage modern slavery risk given that it has become an important issue for investors.

5.3 | Corporations—Managing the Risks Associated With Modern Slavery

In terms of rhetorical frames, corporate narratives emphasize that consumers, investors and regulators all prompt corporations to devote more attention to modern slavery risk.

The awareness of potential forced labour and other human rights violations across the supply chain is driving companies to ensure they can clearly demonstrate that they have implemented effective policies and procedures to mitigate this risk. This change in the business environment is occurring quickly due to societal expectations that are being expressed through demands by consumers, investors and regulators.

(Canadian Chamber of Commerce)

In response to market pressure, modern slavery becomes a (social) risk category (included in the broader issue of human rights below) because of the negative impact each social issue can have on corporate performance and reputation. Corporate rhetoric hence strives to emphasize how risk is mitigated (Table 2, Panel C):

The ability to manage risk is one of our core competencies, and is supported by our risk-aware culture and risk management approach. Environmental and social (E&S) risk is the potential for an E&S issue associated with us, a client, a transaction, a product, a supplier or an activity to have a negative impact on our financial position, operations, legal and regulatory compliance, or reputation. E&S issues include, but are not limited to [...] climate change, environmental regulation, human rights [...] and community engagement. [...] is responsible for developing and maintaining policies to identify, assess, monitor and report on E&S risk, and to regularly review and update E&S risk policies.

(Royal Bank of Canada)

Similar to institutional investors, material issues are those which corporations pay attention to. The importance is assessed with regard to (financial) stakeholders and the potential impact on future performance. In the context of modern slavery, this suggests victims are not necessarily the priority unless they pose a material threat to business success.

In terms of action frames, similar to institutional investors, corporations frequently underscore their commitment to well-

known human rights principles and conventions and their compliance with applicable labour laws. In so doing, they signal a concern for human rights issues. For instance:

We are also committed to act in compliance with applicable labour and employment laws in the jurisdictions where we operate. We are working to develop and implement due diligence processes in our procurement activities to minimize the risk of child and forced labour in our supply chain, to the extent possible.

(Yamana Gold Inc.)

Here, we see that although companies may endorse global principles and conventions, their specific commitments are often expressed in relation to local laws, which are presumably known to be weak in many jurisdictions. Beyond minimal compliance with applicable legislation, corporate communications such as this set a much lower bar, committing to minimize the actual risk of modern slavery in their supply chain only “to the extent possible.” This quote also suggests that concrete action will take place at some future date, as the company is “working to develop due diligence processes”. Typical actions also include the development of corporate policies, such as codes of ethics, sustainability guidelines, human rights policies and supplier codes of conduct to guide sustainability risk assessment. For instance:

All business partners must comply with our Supplier Code of Conduct as part of our terms and conditions, which commits them to abiding by the same standards of business conduct and practices as we do. We actively foster a risk-aware culture at all levels across our organization. Through our business partner selection process, we continue to strive for a well balanced and optimal risk-reward trade-off.

(SNC Lavalin)

As this company mentions, putting a supplier code of conduct in place encourages a culture of risk awareness across all organizational levels, and the choice of suppliers is made while considering a risk–reward balance. Risk management is thus at the cornerstone of corporate policies towards sustainability in general and modern slavery in particular. To ensure adherence to corporate policies, another action undertaken by corporations is to provide training to their employees.

Corporations' risk (action) frame is also characterized by narratives that underscore supply chain monitoring. Risk monitoring that is emphasized includes initial and ongoing due diligence, using for instance supplier questionnaires and internal or external audits. For example:

We require all suppliers [...] to conduct the [...] self-assessment every year, which includes questions addressing modern slavery. [...] Celestica receives the audit reports [conducted] using independent third-party audit firms and, based on the outcomes of the

audits, considers whether any follow-up action is necessary. While Celestica is unable to guarantee that our suppliers do not engage in human trafficking, if determined that a supplier violated the [...] code of conduct, we would work with the supplier to correct the issue; where the supplier refused to take corrective action, we would terminate our relationship with the supplier.

(Celestica Inc.)

The quote above clearly shows that the company performs some monitoring but cannot ensure that its suppliers do not engage in modern slavery. In other words, the risk can never be zero. Terminating a relationship with a supplier is an action that clearly relates to the corporate risk frame, in the sense that when the risk is not sufficiently mitigated, the company prefers to leave. This risk frame clearly clashes with NGOs' eradication frame, as victims are neither rescued nor rehabilitated when the company decides to exit.

In terms of corporate risk (action) frames, it is worth mentioning that corporate narratives give less attention to supply chain monitoring than sustainability policies and training, perhaps because the latter actions are more symbolic than the former. Indeed, specific stories about substantive monitoring in the supply chain are infrequent. Symbolism as opposed to substantiveness also emerges when we analyse corporate narratives depicted in modern slavery statements filed in conformity with the UK or Australian legislation by four companies in our sample. These statements are keen on narrating modern slavery risks inherent to their operations and structure, as required by legislation, in a way that fits within the risk frames they hold. Risk identification, assessment and mitigation processes are presented, together with related themes such as adherence to human rights principles, development of corporate policies, provision of training and supplier monitoring (as discussed above in this section). In the context of modern slavery, substantive reporting would arguably relate to describing concrete actions aiming at eliminating these practices from corporate supply chains. For instance, a substantive reporting item required by the UK and Australian legislation relates to the actual effectiveness of actions ensuring that slavery is not taking place in the supply chain. This item was not directly addressed by companies. For instance, one stated that they were “in the process of developing a set of objectives for [their] human rights program and metrics to measure [their] effectiveness in meeting these objectives, which are currently under review” (RBC) and another mentioned that in further steps, they “will continually monitor the effectiveness of any steps taken to address the risk of modern slavery and human trafficking in [their] supply chain” (Celestica Inc.). Corporate action frames manifest more in terms of symbolic prevention than substantial detection (and victim rehabilitation) as companies emphasize more the description of the means, to the detriment of an evaluation of the effectiveness of the means to address modern slavery risk. This finding is consistent with Mai et al. 's (2023) conclusion about the low quality of modern slavery reporting because of the predominance of symbolism in disclosure.

In sum, we label corporations' metacultural frame a "market" frame. It is the market awareness of modern slavery that brings companies to exhibit specific rhetoric and undertake particular actions to demonstrate the extent to which they address modern slavery risk. Like institutional investors, the broadly shared beliefs, values and perspectives through which corporations give meaning to their thoughts and actions in relation to modern slavery all reflect a preoccupation with risk management. They strive to convince consumers, investors, and government that modern slavery risk has been identified in their supply chain, and that any material risk is adequately managed and mitigated. Modern slavery matters insofar as it matters to market participants. Unsurprisingly, in the context of the introduction of modern slavery legislation in Canada, they would expect government to help them identify modern slavery risk:

Businesses have information through their own supply chains, but it's really through [a] collaborative effort with government and then governments collaborating with their international partners to share information about challenging suppliers, challenging factories and things like that, that can be identified and shared.

(Retail Council of Canada)

As this corporate view emphasizes, corporations would appreciate help from governments to identify wrongdoers among suppliers, which suggests corporations struggle to identify modern slavery throughout their supply chain on their own.

5.4 | Policymakers' Frames—Abdicating to the Market

The Canadian policymakers' rhetorical frame about modern slavery bears several similarities with NGOs' demonization frame (Table 2, Panel D). The introduction of the modern slavery bills was rhetorically justified in multiple ways, including defining and giving examples of the phenomenon and describing conditions leading to it:

Although the pandemic may have aggravated the problem in an exceptional way, we should recognize that the issue of forced labour has always existed. It is a complex phenomenon fuelled by poverty, discrimination and inequality. There are many ways to make a person fall into the trap of forced labour: endless debt repayment, confiscation of identity documents, threats to report to immigration authorities, intimidation, violence and so on. Several cases are sadly well known: children exploited in certain mines in Africa; fishermen and migrants imprisoned on fishing boats in Asia; foreign workers in Dubai. Consumers in rich countries also participate in this system — most often unintentionally — by always seeking the cheapest

products possible. But low prices can come at a human cost that is too high.

(Senator Miville-Dechéne)

By lamenting how poverty, discrimination and inequality can lead to horrific conditions, such as debt bondage, threats and intimidation, by referring to known examples of modern slavery and by contrasting the demand for low prices conducive to modern slavery with the cost of modern slavery, this phenomenon is demonized and portrayed as something that urgently needs to be addressed. Just like NGOs, policymakers also emphasize the omnipresent yet hidden nature of modern slavery. For instance, a parliamentarian made the following comment during the House of Commons debates:

I want members to feel the garments they are wearing. Do we know for certain that the garments we are wearing are free of supply chain slavery? When we go home tonight and open a can of tomato paste or a seafood dish, will we be absolutely certain that there is no element of slavery in the supply chain that brought that product to us? A lot of us take pride in trying to reduce our GHG emissions, so I, like many others, have a couple of solar panel arrays. Am I sure that the components of those solar panels, or the solar panels themselves, are free of supply chain slavery? I ask these questions because cotton, solar panels, tomato paste and seafood products have all been traced to slave-like conditions overseas. Report after report and American customs officials indicate that these products and many others are produced by forced labour and/or child labour, and we innocent, or maybe ignorant, Canadian consumers are complicit in this noxious practice.

(Hon. John McKay)

By insisting that Canadian consumers might be complicit in the toxic practice of modern slavery because they may not be aware that the products they consume were produced through forced or child labour, this member of parliament is demonizing modern slavery to convince members of the House of Commons that they should support the proposed legislation. Moreover, like NGOs, policymakers mobilize statistics to better demonstrate the importance of modern slavery. In fact, they use statistics produced by NGOs to support their call to action. For example, in 2016:

[O]ver 1,200 Canadian companies were infected by supply chain slavery. A World Vision survey estimates that four billion dollars' worth of food products, primarily from Mexico, including coffee, fish, tomatoes, cane sugar and cocoa, are among the most common products of slave labour. Cotton from Xinjiang is produced by Uighur slaves. Cobalt from the Congo is mined by children, and it goes into all the electric

vehicles we are hoping to produce. In Canada, agricultural workers are particularly at risk, as are hotel maintenance workers.

(Hon. John McKay)

These statistics, produced by World Vision Canada, are mobilized not only by numerous other NGOs, but also by the promoters of the proposed legislation, showing the similarities of NGOs and policymakers' rhetorical frames. In the debates, promoters also took the opportunity to recall Canada's commitments to human rights, justifying the need for a modern slavery law.

Although the demonization (rhetorical) frame embraced by Canadian policymakers is similar to that of NGOs, they differ sharply on action frames. Our data suggest that policymakers mainly adopt what we call a "reporting" frame. Indeed, the proposed legislation would require organizations to report on steps taken to prevent and reduce the risk that forced or child labour is used in their supply chain internationally.⁵ Reports must be publicly accessible and include a description of the reporter's activities and structure, indicating the parts at risk of modern slavery; the policies and processes in place to tackle modern slavery, including any measures taken to remediate it; the training provided to employees on modern slavery and how the entity assesses its effectiveness in ensuring that modern slavery does not take place in its supply chain. Any company that fails to report or knowingly provides false or misleading information would be liable to a fine of up to \$250,000. By adopting a reporting frame, Canadian policymakers are seen to mimic other countries that have adopted a similar so-mandatory reporting or "transparency" approach:

Like the British and Australian legislation, the bill I am proposing aims first for transparency. I believe Bill S-211 is a pragmatic and reasonable approach, a legislative compromise, that seeks to rally all stakeholders to finally move forward on this issue.

(Senator Julie Miville-Dechêne)

Promoted here as a "pragmatic" proposal, Bill S-211 encourages companies to reflect on modern slavery and assess the extent to which these practices might exist in their supply chain. The legislation represents a "legislative compromise", perhaps, because it is more likely to pass if punishment is linked to companies' failure to file the required reports than if imposed in response to modern slavery practices identified in their supply chains. The proposed legislation is described as a first step toward addressing the issue of modern slavery:

Through its inaction, Canada is complicit in these unacceptable practices. It is therefore time to shed light on the human cost of low prices. Bill S-211 is the essential first step in the fight against forced labour. It will require large companies and roughly 100 federal institutions to publish an annual report on their efforts to prevent and decrease the risks of forced labour and child labour in their supply chains.

(Senator Julie Miville-Dechêne)

Canadian policymakers are reportedly aware that more stringent legislation exists elsewhere in the form of mandatory human rights due diligence laws (HRDD), for instance the French Duty of Vigilance Law and the (proposed) Dutch Child Labour Due Diligence Law. Such laws put the onus on companies to demonstrate that they have implemented sufficient measures to identify, prevent and mitigate modern slavery. The mandatory reporting approach taken in Canada is softer, focussing on what Canadian policymakers call "transparency". They admit Bill S-211 will not spur immediate action to eradicate modern slavery, rather that it is aimed at achieving transparency:

Under this legislation, companies are required to report on, not to eradicate, forced labour in their supply chains. In other words, for companies, the obligation is to achieve transparency, not results. [...] We also learned that we needed to give companies time. The first report they submit, in year one, won't be perfect. Companies will hire consultants and learn as they go. The important thing to understand about this bill is that it imposes a reporting obligation, not an obligation to clean up the supply chain in one year by getting rid of all unacceptable practices. It's important to understand that. Down the road, in a few years' time, it may prove necessary to change tack because the approach isn't working; Canada can decide that it needs a more punitive model because companies are simply flouting the rules. That is how we arrived at this compromise vis-à-vis the legislation in other jurisdictions.

(Senator Julie Miville-Dechêne)

Through reporting requirements, Canadian policymakers aim to raise awareness within corporations. Their reporting action frame is admittedly quite different from NGOs' eradication frame. The proposed legislation does not ask companies to "clean up the supply chain", as NGOs seek to do. Instead, it requires them to contemplate the issue, and report on how they deal with it in their organizational context. In doing so, policymakers hope corporate actors will be triggered to improve their processes with regard to modern slavery. The pragmatic approach adopted by policymakers differs from the drastic approach adopted by NGOs. NGOs consider that modern slavery is immoral, and all actions should converge toward eradication. Policymakers also recognize that modern slavery is immoral, but rather adopt a softer reporting approach aimed at conscientizing corporations and providing information to market participants.

In sum, although policymakers' rhetorical frame is demonization, their action frame is limited to reporting. They explicitly acknowledge that their action is not intended to lead directly to eradication. How can these seemingly opposite rhetorical (demonization) and action (reporting) frames be reconciled? We argue it is through the market metacultural frame they hold (Table 2, Panel D). Indeed, this market metacultural frame ties together their rhetorical and action narratives: policymakers undoubtedly demonize modern slavery but rely on (or abdicate

to) the market to punish companies in response to their modern slavery disclosures. They see their role as providing market participants with useful information to help them judge whether corporate behaviour is acceptable:

I know some, who may no longer be here, may say that this legislation is too soft, but I would suggest that this legislation goes a far way in addressing this issue: I think consumers, shareholders and stock markets will not look very favourably upon companies that do not address this issue. I know that I, as a Canadian, and most Canadians, would not want to either buy products from, or own shares in, a company that does these practices.

(Hon. John McKay)

Above and beyond fines, this Bill's strength is that it relies on the fact that the reputation of companies is at stake. Their reports will be made public and examined by government, investors, human rights advocates and consumers.

(Senator Julie Miville-Dechêne)

Under this “name and shame” approach, businesses are expected to take the issue of modern slavery seriously to protect their reputations. Policymakers believe investors, NGOs and consumers will scrutinize corporate reports on modern slavery. They also rely on NGOs to inform market participants and consumers about unacceptable behaviour. In the view of policymakers, responsible organizations will be rewarded. But most importantly, wrongdoers will be penalized by the market, which may jeopardize their existence. Naming and shaming might thus be the most important sanction, considering the light monetary penalties of only \$250,000 for nonreporting or misreporting.

Our examination of Canadian stakeholders' frames leads us to underscore various similarities and differences between them. In terms of similarities, we highlight that institutional investors and corporations both hold a market metacultural frame. Their rhetorical frames commonly show a conception of modern slavery as a risk category. Institutional investors' action frame focusses on the assessment of modern slavery risk, whereas the corporate action frame emphasizes the various risks associated with modern slavery. Modern slavery risk becomes important if the associated risks are material, and this materiality is linked to the attention given to modern slavery by market participants such as individual investors and consumers. For their part, NGOs adopt a community metacultural frame under which they give all their attention to victims. Their rhetorical frame demonizes modern slavery by demonstrating the harm it causes to victims. Their action frame is consequently geared towards eradication. Paradoxically, policymakers share a demonization rhetorical frame with NGOs and a metacultural market frame with institutional investors and corporations. Although they demonize modern slavery in their rhetorical narratives, which suggest a community metacultural frame is at play, they privilege the market frame, leaving responsibility for punishing

wrongdoers to market forces. In sum, the market frame is seen to dominate, as it is the metacultural frame held by all but one of the stakeholder groups.

6 | Discussion and Conclusions

Drawing on the public policy tradition of framing theory that offers the notions of rhetorical, action and metacultural frames, we analysed the various frames held by NGOs, institutional investors, corporations and policymakers toward modern slavery and labelled the various types of frames evident in this policy domain. In terms of metacultural frames, we found that only NGOs clearly hold a community frame, aimed at eradicating modern slavery. All other actors hold a market metacultural frame, aimed at ensuring that modern slavery is appropriately managed as an “acceptable risk”. Policymakers seemingly navigate between community and market (metacultural) frames, but they appear to privilege the latter when action frames are analysed, that is, they allow consequences to be imposed by market forces in response to corporate disclosures. Concerning rhetorical frames, investors and corporate actors frame modern slavery as yet another risk category to be managed while policymakers and NGOs adopt a demonization rhetoric. Action frames vary. Although NGOs are focused on actions tied to eradication, all other stakeholder groups are focused on some (distinct) actions related to risk: investors focus on risk assessment, whereas corporate actions focus (both symbolically and substantively) on bringing attention to risks associated with modern slavery, and policymakers focus on reporting about these risks.

By adopting an upstream perspective, our study focused on understanding how actors conceive of modern slavery before legislation is enacted, instead of adopting a downstream view that evaluates disclosures made in response to such legislation, as previous research has done (e.g., Bayne et al. 2022; Christ and Burritt 2023; Christ et al. 2019; Kathyayini et al. 2022; Mai et al. 2023). In doing so, our study offers a theoretical explanation of the reasons why transparency legislation fails. By underscoring that only NGOs hold a community metacultural frame while other stakeholders embrace a market frame, the failure to eradicate modern slavery through transparency legislation becomes obvious: holding a market frame that views modern slavery as a set of risks to be assessed, managed or reported is unlikely to lead to eradication. This is in line with Ahmad et al. 's (2024) conclusion that, although regulators claim that modern slavery disclosure regulations are a step in the right direction, the market orientation underlying such regulation perpetuates the risk of modern slavery and allows social wrongs to continue in global supply chains. In other words, we find that currently, stakeholders talk past each other because they hold metacultural frames that are seemingly irreconcilable. Institutional investors, corporations and policymakers all share a market understanding of modern slavery, whereas NGOs have an eradication understanding of it. The problem is that understanding modern slavery through the lens of the market will never lead to eradication if the phenomenon is at best riskized, and thereby tolerated.

The tensions between a metacultural community frame and a metacultural market frame explain why similar rhetorical frames lead to different action frames (Schön and Rein 1994). Both NGOs and policymakers employ a demonization rhetorical frame. However, although NGOs pair this frame with an eradication action frame, policymakers pair it with a reporting action frame. Tensions exist between these two stakeholder groups about the urgency of addressing the issue of modern slavery. In accordance with their community metacultural frame, NGOs call for immediate efforts to identify instances of modern slavery, remedy the situation and rehabilitate the victims. To them, even a single instance of modern slavery is one too many. Although Canadian policymakers recognize the urgency of adopting modern slavery transparency legislation, they view legislation only as a “first step” in prompting corporations to examine their supply chains for potential modern slavery risks and consider ways to mitigate these risks in the future. They seem to think that any transparency legislation is better than no such legislation and, perhaps, consider that stronger legislation would have faced fierce opposition during debates and thus never made it to the point of being enacted. Therefore, they rely on market forces to stem the tide, assuming that investors and consumers will pressure corporations to behave appropriately. In other words, policymakers are abdicating to the market, in accordance with a market metacultural frame.

NGOs and other stakeholders (institutional investors, corporations and policymakers) seemingly hold incompatible metacultural frames. NGOs’ community metacultural frame more easily adopts an action of eradication. Indeed, to view something as harmful to a community implies that the solution is to remove the harm from the community. Other stakeholders’ market metacultural frame comes to tolerate modern slavery. Viewing modern slavery as a market issue implies distance from the community and instead presents opportunities to “trade” on what is harming the community (e.g., by pricing its very existence, in the form of risk), providing no incentive to understand the problem through a community lens. Here, risks exist and must be managed, though not necessarily eliminated. Therefore, an important question is whether it is possible for all stakeholder groups to move closer to a community metacultural frame. According to Schön and Rein (1994, 37), those who participate in a policy controversy are capable of reflecting on frame divergence, potentially leading to reframing. Participants in a policy conversation are expected to be able to put themselves in the shoes of other participants and to realize that their own frame might contribute to the controversy. Although reframing seems theoretically possible (Schön and Rein 1994), can institutional investors, corporations and policymakers pragmatically integrate a community perspective within their market perspective? “Riskizing” modern slavery might be coherent with a community frame if risk assessment (by institutional investors), risk management (by corporations) and risk reporting (required by policymakers) is meant to prevent, detect and rehabilitate (in sum, to eradicate). Although our study demonstrates that stakeholder groups are currently talking past each other about modern slavery, we believe there are possibilities to move toward a commonly held community frame aimed at eradication.

According to Cockayne (2021), modern slavery is the terrible result of market failure—specifically, the inability to account for the social costs of production. Our findings show that institutional investors risk-assess modern slavery in the sense that they determine whether its existence can lead to negative financial consequences for the corporation (investee). They are therefore interested solely in a corporate-centric perspective: how modern slavery can affect enterprise value. By doing so, they ignore the impact that modern slavery in their supply chain might have on workers and their family. In other words, they ignore the socio-centric effects. However, these effects can be estimated qualitatively. For example, Himick and Ruff (2019) documented an anti-slavery movement which raised awareness by suggesting that the production cost of sugar includes the lives of men, women and children. Inside-out effects can also be estimated quantitatively. For instance, Reed et al. (2018) report that the cost per victim of modern slavery in the UK amounts to approximately GBP 328,000. However, market participants arguably do not know the costs of modern slavery. If institutional investors and consumers were aware of these qualitative and quantitative impacts, they might consider them in their risk assessments. In other words, incorporating socio-centric effects into risk assessments could bring market participants closer to adopting a community frame. Institutional credit investors can ensure these costs are priced into the cost of capital, and institutional equity investors can require investees to identify and manage these socio-centric risks. Institutional investors can leverage their influence to require corporate practices that prevent modern slavery and remediate its occurrence, in other words, to eradicate it (Cockayne 2021). This suggests the metacultural frames of community and market are not necessarily irreconcilable, and offers nuance to our earlier comments in which metacultural frames constrain eradication-focused action. Future research could try to unravel how the different levels of frames (metacultural, rhetorical and action) could be brought closer together by and through one another. For instance, research might explore whether rhetorical frames, such as shared appeals to responsibility, can serve as intermediaries that enable actors to bridge divergent metacultural commitments, or it could examine whether similar action frames (e.g., risk reporting as a solution) could help make divergent perspectives visible to actors with different rhetorical frames.

Although such visibility might be created passively (i.e., not purposefully), policymakers could actively contribute to making socio-centric effects more visible. Indeed, in our study, policymakers referred to the “human cost of low prices” in their rhetorical framing of the problem. Policymakers could finance additional research to measure the cost of modern slavery, similar to the study by Reed et al. (2018) mentioned above, and the reports could be publicly available. These are practical actions, which could still be part of an action frame that is focused on disclosures, but which nonetheless start to push the ideas around what a disclosure-focused action policy could involve.

Furthermore, our analysis indicates that corporations criticize policymakers for not helping to identify wrongdoers among suppliers and that institutional investors criticize transparency legislation for providing insufficient information to adequately assess modern slavery risks. These criticisms suggest that

corporations and institutional investors have (at least some) interest in socio-centric effects. Policymakers could collaborate with their peers worldwide and use the work of NGOs to identify wrongdoers and maintain a public register of these offenders. Through their transparency legislation, policymakers could require companies to consult this registry and disclose the fact that some suppliers in their supply chain are involved in modern slavery, helping institutional investors better assess risk. Reports on the cost of modern slavery mentioned above could be included as an introduction to this register and/or sent to institutional investors for consultation. Once again, this supports the idea that the metacultural frames of community and market are not necessarily incompatible. Making market participants aware of socio-centric effects could work toward eradication of modern slavery.

Furthermore, Canadian policymakers could genuinely commit to assess the effectiveness of Bill S-211 and move on to stronger legislation if (most probably) needed. Instead of leaving the onus to penalize wrongdoers to the market, stronger legislation could move closer to the community metacultural frame by requiring companies to prevent, detect and remediate modern slavery. Although the Canadian politicians that championed the proposed legislation recognize that Bill S-211 is only “a first step”, they are reportedly aware of the existence of stronger legislation elsewhere, such as the French Duty of Vigilance Law, which requires companies to create and implement publicly available vigilance plans for which they can then be held accountable. The French law is also designed to aid the victims in achieving justice. This suggests again that the metacultural frames of community and market are not necessarily irreconcilable. If legislation were to require the prevention, detection and remediation of modern slavery, it would give institutional investors a different basis on which to assess risk, and it would give companies a new baseline on which to manage risk, all of which would converge towards eradication. In sum, our analysis and discussion suggest that there are possible ways to attenuate the market failure leading to modern slavery.

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Data Availability Statement

Research data are not shared.

Endnotes

- ¹ Officially titled the “Fighting Against Forced Labour and Child Labour in Supply Chains Act.”
- ² We searched the Factiva database for Canadian press coverage about modern slavery which could provide us with the views of the victims. The number of articles was so low that we decided to disregard this data source.
- ³ The largest institutional investors were found at: https://en.wikipedia.org/wiki/Institutional_investor#Canada and the largest money managers were found at: <https://www.td.com/ca/en/asset-management/>

<documents/institutional/pdf/Benefits-Canada-2022.pdf> (both consulted 28 September 2022).

⁴ We selected companies from the following site: https://en.wikipedia.org/wiki/S%26P/TSX_Composite_Index#List%20_of_companies (consulted 28 September 2022).

⁵ It is worth noting that the proposed legislation deals with child labour and forced labour and not necessarily with all forms of modern slavery.

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