

Human Trafficking and Other Labor Risks in the Textile and Apparel Sector

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Verité

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1. Introduction

1.1 Objective

This report provides an overview of forced labor¹ risks in the textile and apparel sector globally. In some cases, the report also discusses other serious labor abuses as indicators of conditions or practices in the working environment that contribute to workers' vulnerability to forced labor.

The objective of this report is to raise awareness of the forms that forced labor may take in the textile and apparel sector, its structural causes, and the combination of factors that may bind workers to their jobs. The intended audience for these findings includes government and industry actors seeking to strengthen their human rights due diligence approaches to manage the risks of forced labor, as well as workers and their advocates, civil society, and consumers.

Textile and apparel entities operate within an increasingly stringent regulatory environment that demands proactive measures to prevent human trafficking. Federal legislation such as the Trafficking Victims Protection Act, the Tariff Act of 1930, the Trade Facilitation and Trade Enforcement Act of 2015, the Countering America's Adversaries Through Sanctions Act, the Uyghur Forced Labor Prevention Act, as well as relevant regulations like the Federal Acquisition Regulation and various state-level requirements, establish clear expectations for businesses to monitor and address trafficking risks within their operations and supply chains.

Textile and apparel sector entities also face compelling business reasons to implement robust due diligence systems. The reputational damage from association with trafficking operations can result in immediate loss of contracts, particularly with government agencies and major corporations that have adopted zero-tolerance policies. Furthermore, the operational disruptions caused by trafficking-related investigations can significantly impact service delivery and customer relationships, while the financial costs of remediation and legal proceedings can be substantial.

¹ **Note:** The United States recognizes two primary forms of trafficking in persons: forced labor and sex trafficking. For the purposes of this report, several terms are used such as "trafficking in persons," "human trafficking," and "forced labor." In this report, these terms refer to a crime whereby traffickers exploit and profit at the expense of adults or children by compelling them to perform labor.

The focus of this report is on labor supply chains and the work performed by foreign and domestic migrant² workers, subcontracted workers, and otherwise vulnerable workers in the production of textiles and apparel items (also referred to as garments). Guiding frameworks used to benchmark practices and conditions in this sector include but are not limited to:

- [ILO Convention 29 – Forced Labour Convention, 1930](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [ILO Safety and health in textiles, clothing, leather and footwear code of practice](#)

1.2 Scope

This report covers the recruitment, contracting, and management of labor involved in the production of textiles and apparel. For information on the human trafficking risks associated with the production of the materials used in the manufacturing of textiles and apparel, see the commodity reports: [Cotton](#), [Leather](#), [Silk](#), and [Wool](#) available on the [Responsible Sourcing Tool](#).

Workers in focus include those who perform a wide variety of functions to produce textile and apparel items including: workers at cotton gins, workers at thread/yarn spinning mills, workers at fabric mills, sewing machine operators (tailors), tailors' assistants, cutting masters, assistant cutters, fabric and trim storekeepers, garments technicians, quality checkers, ironers/pressers, thread trimmers/cleaners, packers/folders, and home-based workers who perform value add work such as embroidery.

Any worker with one or more of the vulnerabilities described in this report can become a victim of forced labor. Attention is given to research indicating acute vulnerabilities faced by migrant, seasonal, and/or subcontracted workers (workers who are supplied by third party providers), who are often exposed to deceptive recruitment, charging of fees and expenses to secure a job, debt bondage, excessive working hours, retention of identity documents, restrictions on freedom of movement, and unsafe working and living conditions.

² In this report, the term migrant worker refers to a person who migrates, or has migrated, from one country to another, with a view to being employed by someone other than him/herself, including any person regularly admitted, as a migrant for employment, and/or to seek temporary or permanent residence in another country. This definition is aligned with [ILO Convention C097 – Migration for Employment Convention \(Revised\), 1949](#) and the [U.S. Department of Homeland Security's Office of Homeland Security Statistics](#).

1.3 Context and Methodology

1.3.1 Risk Factors, Risk Indicators, and Analytical Framework

As is the case across most industries, certain workers are more vulnerable to forced labor risks than others. This is based mainly on their ability to decline or leave a job in order to protect their welfare. Verité’s research has found that the greatest risk of forced labor is at the intersection of worker vulnerability and employment practices, including recruitment, that exploit that vulnerability. There are often overlapping characteristics of work and workers at this intersection, such as those in low-paid, low-skilled, dirty, dangerous, and demeaning (“Three D”) jobs; subcontract workers and workers recruited by third-party intermediaries; migrant workers; workers compelled by severe economic drivers; and workers subject to coercion by the state.

This report examines both socio-demographic and employment practice-related *risk factors*, which contribute to worker vulnerability, and *risk indicators* or signs, which help identify cases of forced labor. Risk factors and risk indicators have overlapping elements and causes. To help contextualize the many indicators highlighted by the research, Section 3 organizes them into the four most common **risk factors** that underlie them:

- Involvement of labor contractors, recruiters, agents or other middlemen in the labor supply chain
- Migrant workers and immigrants with precarious residency status
- Workers experiencing poverty, marginalization,³ and absence of alternative income options
- State-imposed forced labor programs

Research for this report identified and discusses the following **indicators** of forced labor in the textile and apparel sector:⁴

³ The [ILO Global Guidelines on the Prevention of Forced Labour Through Lifelong Learning and Skills Development Approaches](#) notes that people most at risk of forced labor are those that are vulnerable and includes marginalization among the common characteristics of vulnerability, along with suffering discrimination on the grounds of age, ethnicity, disability, gender, migration status, race, religion, or sex, etc. leading to social and economic exclusion or marginalization.

⁴ The ILO Forced Labour Convention, 1930 (No.29), defines forced labor as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.” To support front line actors in the identification of situations of forced labor, ILO Indicators of Forced Labor - 2025 Revised Addition includes 11 of the most common signs observed in forced labor cases. They comprise situations that qualify as the menace of any penalty

- Abuse of isolation
- Abuse of vulnerability
- Abuse or manipulation of debt
- Debt linked to recruitment practices (including charging of fees)
- Deceptive or fraudulent recruitment (regarding the nature and terms of the job and/or the working and living conditions)
- Degrading work-related living conditions
- Hazardous or degrading working conditions
- Inability to terminate employment
- Onerous working hours or work schedule
- Physical or sexual violence
- Recruitment by State for purpose of economic development
- Restrictions on workers' movement
- Retention of workers' personal documents
- Withholding of wages

1.3.2 Sources of Information and Criteria for Inclusion

Sources of information used for this report include a broad range of publicly available sources, such as civil society publications, journalistic investigations, academic research, and government reporting. These sources were used to identify documented or credible allegations of labor exploitation across textile and apparel sector operations. We note that the absence of documentation (e.g., research or investigative reports) pertaining to certain geographic locations or types of textile and apparel businesses does not signify low or the absence of risk and conversely, more available information on locations does not necessarily mean the risk is higher.

Further, allegations were not required to meet a legal or prosecutorial threshold to be included in the analysis, and not all findings presented here meet the legal definition of human trafficking, including

(also called coercion) and the absence of voluntary consent, or the ability to withdraw that consent, in other words the workers' freedom to leave the job. (To meet the threshold of forced labor, a situation must have some a *combination* of these two types of abuse.) The 11 indicators do not map exactly to the ILO's earlier, more granular 2014 *Hard to See, Harder to Count: Handbook on Forced Labour Surveys*, which describes 22 circumstances commonly giving rise to involuntary work or qualify as forms of coercion. The list of indicators here are drawn from both these ILO documents as well as Verité's research for this report.

forced labor. Labor exploitation occurs along a continuum, from fair, safe, and legal work, in which employment is freely chosen, to situations characterized by a combination of involuntariness and coercion.⁵

2. Overview of the Textile and Apparel Sector

2.1 Background

Forced labor risk is present across all tiers and production stages of textile and apparel supply chains, from the harvest and production of cotton to the spinning of yarn, weaving of fabric, and assembling of garments.⁶ The sector relies on labor-intensive processes commonly carried out by low-paid and relatively low-skilled workers and is known for risk factors such as excessive overtime, low wages, unsafe working conditions, verbal and sexual harassment, and other practices that can result in conditions of forced labor all along the supply chain. While the sector contributes significantly to economic and social development in countries around the world, providing employment opportunities to millions of workers, it is characterized by geographically dispersed production and market-driven pressures that present challenges for the protection of labor and human rights.⁷

2.1.1 Overview

Most countries in the world participate to some degree in the textile and apparel sector. In many cases, the sector is a key contributor to national development, providing livelihoods to 90 million people worldwide and driving economic growth.⁸ The sector has relatively low barriers to entry as it is not highly capital intensive and primarily utilizes low-skilled workers. Production can easily be shifted from country to country in pursuit of lower costs (e.g., cheap labor and inputs), creating a highly competitive

⁵ For operational forced labor indicators of involuntariness and coercion developed by the ILO, please refer to the International Labour Organization's [Hard to See, Harder to Count: Handbook on Forced Labour Surveys](#) (2024). The presence of an indicator alone does not necessarily confirm a legal finding of forced labor but signals elevated risk, especially when multiple indicators are present simultaneously.

⁶ ["Tracing the threads: Forced labor in cotton supply chains." Evidensity, 15 Jul 2025.](#)

[2021 Apparel and Footwear Benchmark Report. KnowTheChain, April 2021.](#)

⁷ ["Textiles, apparel, leather and related products." International Labour Organization.](#)

⁸ ["Advancing Decent Work in Supply chains - Decent Work Challenges and Opportunities in the Textiles and Clothing Sector." International Labor Organization, Mar 2025.](#)

environment and downward pressure on wages and working conditions worldwide.⁹ Top exporters include China, Bangladesh, Vietnam, and India; additional key exporters in the global textile and apparel market include Italy, Germany, Turkey, and Pakistan.¹⁰

2.1.2 Production Processes

Textile production involves converting natural and/or synthetic fiber (e.g., cotton, wool, polyester) into yarn and thread through ginning, carding, combing, and spinning. Yarn and thread are then woven or knit into fabric. Fabric is finished and dyed, then used to produce apparel items. Apparel production involves multiple steps, including cutting, sewing, pressing, and finishing. Value addition includes embroidering, printing, and other embellishments.

2.1.3 Supply Chain Structure

Textile and apparel supply chains are complex, often including numerous tiers spanning several countries and involving hundreds of specific production steps performed by different suppliers.¹¹ The sector has developed in response to globalization and increasing requirements by multinational brands for flexibility and quick turnaround times. Major multinational brands often focus on branding and marketing; they outsource textile and apparel production to third-party agents who in turn source from a large, global network of factories that produce garments for both domestic and international markets.¹² These factories can range in size from small to very large (thousands of workers) and include home-based workshops.¹³

⁹ ["Textile workers in developing countries and the European fashion industry; Towards sustainability?" European Parliament Briefing, 2020.](#)

¹⁰ ["Textiles \(HS Section: 11\) Product Trade, Exporters and Importers." The Observatory of Economic Complexity.](#)

¹¹ ["Accelerating action for a sustainable and circular garment and footwear industry: which role for transparency and traceability of value chains?" UNECE, 2020.](#)

[Richero, Raul and Simon Ferrigno. "A Background Analysis on Transparency and Traceability in the Garment Value Chain." DAI Europe, 2016.](#)

¹² ["Call for Expression of Interest. Combatting child labour in Turkish garment supply chains." UNICEF, August 2022.](#)

¹³ ["Call for Expression of Interest. Combatting child labour in Turkish garment supply chains." UNICEF, August 2022.](#)

[Sreedharan, Liva and Aarti Kapoor. "Sitting on pins and needles: a rapid assessment of labour conditions in Vietnam's garment sector." Anti-Slavery International, April 2019.](#)

Within this outsourcing structure, subcontracting is widely practiced. The network of outsourced suppliers often subcontract specific parts of work to smaller workshops, allowing them to respond quickly to shifting market demands. Subcontracted workshops often accept low prices from larger factories, which translate to low wages (often paid in cash), excessive working hours, and a lack of workplace protections.¹⁴ Manufacturers often subcontract specific processes, such as embroidery, to smaller producers, and in some countries, such as India and Bangladesh, homeworkers are contracted to provide specific services, working out of their own homes and paid a piece rate.¹⁵ Unauthorized and/or undisclosed outsourcing (in which the client is not informed of the shift) commonly takes place, particularly with smaller firms or home-based workshops.¹⁶

In some cases, textile and apparel supply chains are integrated, either vertically or horizontally. In vertical integration, a single company controls and performs multiple stages of the manufacturing process (e.g., yarn spinning, fabric weaving, and textile production). In horizontally integrated enterprises, the same production process occurs across several units that are often registered separately, despite belonging to the same firm.¹⁷

Subcontracting arrangements can also flow vertically or horizontally. Vertical subcontracting means that the order passes from the tier-one factory to smaller factories or units. Horizontal subcontracting means that the order is passed to a “sibling” factory of roughly the same size. Subcontracting can send orders across international boundaries as first-tier facilities subcontract orders to countries where the cost of

[“Accelerating action for a sustainable and circular garment and footwear industry: which role for transparency and traceability of value chains?” UNECE, 2020.](#)

¹⁴ [“Why subcontracting fails workers in the fashion industry.” Löning Human Rights and Responsible Business, Sept 2025.](#)

¹⁵ [“Forced labour and child labour in Bangladesh's garment sector: Documenting risks and informing solutions.” University of Nottingham Rights Lab, Jan 2025.](#)

¹⁶ [“Fact sheet: Hidden subcontracting in the garment industry.” SOMO, 1 Sept 2015.](#)

[“Hidden subcontracting in the garment industry.” SOMO, 23 Sept 2015.](#)

¹⁷ [“Sourcing Apparel: Vertical VS Horizontal Integration \(Pros & Cons\).” SgT, The Textile Quality Experts, 2022.](#)

labor is even lower.¹⁸ Many subcontracting agreements between facilities are relatively informal, making transparency in the supply chain extremely difficult.¹⁹

2.1.4 Purchasing Practices

Garment supply chains in particular are highly buyer-driven, offering brands the flexibility to source garments from many different countries and suppliers and the opportunity to shift production with relative ease.²⁰ This flexibility for purchasers typically translates to precarity for manufacturers. Suppliers often cut prices and speed up production times in order to remain attractive to buyers and avoid losing orders, resulting in thin profit margins and, in some cases, operating at a loss.²¹ The high degree of flexibility in the sector also results in volatile supplier-buyer and supplier-supplier relationships, which in turn often translate to unstable employment contracts with workers, as demand for product and orders can rise and fall.²² The significant amount of leverage that buyers have over suppliers, especially small-scale garment factories, in unilaterally setting prices and turnaround times can result in additional dynamics that ultimately harm workers. Factories may pay their workers low piece-rates and require them to work overtime to meet production demands, rather than an hourly wage that complies with minimum wage laws. Buyers' deadlines can drive forced overtime in the textile and apparel sector. Workers may work up to 18 hours a day, seven days a week in advance of a deadline.²³ This can result in times during which factory owners do not have enough cash flow to pay their workers, or in extreme cases, low profit margins can force them to close, resulting in job loss, with workers being dismissed

¹⁸ ["Sourcing Apparel: Vertical VS Horizontal Integration \(Pros & Cons\)." SgT, The Textile Quality Experts, 2022.](#)

[Abrar Ahmed Apu. "Subcontracting in Textile and Clothing Sector in Bangladesh." Textile Today, 1 Feb 2013.](#)

¹⁹ ["Faircapacity Tools Responsible Subcontracting: Overview & Guidelines." Social Accountability International, Sept 2022.](#)

["Hidden subcontracting in the garment industry." SOMO, 23 Sept 2015.](#)

²⁰ [Hedrich, Saskia et al. "Revamping fashion sourcing: Speed and flexibility to the fore." McKinsey, 12 Nov 2021.](#)

[Richero, Raul and Simon Ferrigno. "A Background Analysis on Transparency and Traceability in the Garment Value Chain." DAI Europe, 2016.](#)

²¹ ["Textile workers in developing countries and the European fashion industry; Towards sustainability?" European Parliament Briefing, 2020.](#)

²² [Paton, Elizabeth. "A Close Look at a Fashion Supply Chain is Not Pretty." The New York Times, 28 Jul 2020.](#)

²³ ["Working hours and overtime: 96-hour workweeks." Clean Clothes Campaign.](#)

without being paid wages owed to them. Ultimately, the demand for flexibility, low labor costs, and short lead times for new product designs contribute to labor risks in the sector.²⁴

2.2 Labor Supply Chain and Workforce Characteristics

The textile and apparel sector is one of world's most globalized sectors, providing jobs for over 90 million workers worldwide.²⁵ For many workers, the textile and apparel sector offers a first opportunity to gain employment in the formal economy, which typically offers higher and more stable pay than the informal sector or agriculture. However, due to the highly competitive nature of the sector, as described above, wages are often below the legal minimum and working conditions can be both exploitive and hazardous.²⁶ The sector is characterized by low levels of unionization and reliance on migrant labor. Approximately 75 percent of the workers in garment and textile supply chains across Europe, Asia, North and South America, and Africa are migrant workers.²⁷ Key destination countries in the sector include Jordan, Malaysia, Maldives, Taiwan, and Thailand.²⁸

Garment factories increasingly tend to subcontract hiring, usually through third-party labor contractors (also called brokers), who recruit and may supervise and pay workers, or labor recruiters (also called private employment agents or agencies), who identify and recruit workers who are then employed by factories. Demand for quickly available, flexible, and cheap labor drives the hiring of undocumented (illegal) migrant workers through labor brokers. These workers are often casual or temporary workers.²⁹ In addition to subcontracted facilities, much work in the textile and apparel sector is outsourced to "homeworkers" who work in their homes and are paid on a piece-rate basis, sometimes by contractors or brokers and sometimes directly by factories.³⁰ These workers—predominantly women—are generally

²⁴ ["Sustainability and Circularity in the Global Textile Value Chain: Global Stocktaking." United Nations Environment Programme, 2020.](#)

²⁵ ["Advancing Decent Work in Supply chains - Decent Work Challenges and Opportunities in the Textiles and Clothing Sector." International Labor Organization, Mar 2025.](#)

²⁶ ["Garments and Apparel." United Nations University, 1 May 2024.](#)

²⁷ [Dawkins, Peter. "Tackling discrimination in the global textiles and apparel sector." Global Reporting Initiative, 4 Sep 2025.](#)

²⁸ ["Migrants: Workers on the Move." Clean Clothes Campaign.](#)

["Fact Sheet: Migrant labour in the textile and garment industry; a focus on the role of buying companies." SOMO, Feb 2016.](#)

²⁹ ["Garments and Apparel." United Nations University, 1 May 2024.](#)

³⁰ ["Garments and Apparel." United Nations University, 1 May 2024.](#)

low-skilled and considered “independent contractors.” They are largely not monitored for safety hazards, hours, pay, or the involvement of children in the work and are exempted from benefits and other social protections.³¹

Female workers constitute two thirds to three quarters of the textile and apparel sector workforce. Despite the significant presence of women in the labor force, tasks within the sector are highly segregated, with women relegated to the low-skilled, low-wage jobs, whereas men tend to be employed in leadership, management, and technical jobs that involve working with advanced machinery (e.g. jet dyeing and fabric rolling machines).³² In textile production, women tend to perform ancillary tasks, such as moving fabric between machines, loading and unloading materials, assisting with basic chemical processes, and handling fabric reams through stitching, folding and packing. Though these tasks are essential for daily operations, they are classified as non-technical positions for which formal contracts are typically not required.³³ Positions such as machine operators, digital print assistants, quality checkers, and supervisors—which require more training and offer higher pay and advancement opportunities—are typically held by men.³⁴ In garment and apparel production, women tend to work as sewing machine operators and helpers while men work in supervisory and leadership roles on production floors.³⁵ Beyond employment discrimination, women are often subjected to sexual harassment and abuse, which are ILO indicators of forced labor.³⁶

³¹ ["Garments and Apparel." United Nations University, 1 May 2024.](#)

³² [Behind the Seams: Reimagining Women's Work in the Textile Sector's Green Transition | WRI India](#)

["Better Work: Gender Equality in the Global Garment Industry. Highlights of the Better Work Strategy 2018-2022." Better Work Global.](#)

[Sikder, Mohammad Jalal Uddin. "From Marginalization to Silent Decline: Understanding Systemic Barriers of Women's Future in Bangladesh's RMG Industry." *Journal of South Asian and Middle Eastern Studies*, 48\(3-4\) pp.73-97, 2025.](#)

³³ [Yadav, Pooja et al. "Behind the Seams: Reimagining Women's Work in the Textile Sector's Green Transition." WRI India, 27 Jun 2025.](#)

³⁴ [Yadav, Pooja et al. "Behind the Seams: Reimagining Women's Work in the Textile Sector's Green Transition." WRI India, 27 Jun 2025.](#) ["Better Work: Gender Equality in the Global Garment Industry. Highlights of the Better Work Strategy 2018-2022." Better Work Global.](#)

[Sikder, Mohammad Jalal Uddin. "From Marginalization to Silent Decline: Understanding Systemic Barriers of Women's Future in Bangladesh's RMG Industry." *Journal of South Asian and Middle Eastern Studies*, 48\(3-4\) pp.73-97, 2025.](#)

³⁵ ["Better Work: Gender Equality in the Global Garment Industry. Highlights of the Better Work Strategy 2018-2022." Better Work Global.](#)

³⁶ ["Garments and Apparel." United Nations University, 1 May 2024.](#)

3. Forced Labor and Other Labor Rights Risk Factors Associated with the Textile and Apparel Sector

The United States Department of State's *2025 Trafficking in Persons Report* noted evidence of forced labor (or risk of forced labor)³⁷ associated with textile and apparel production in the following 29 countries: Afghanistan, Argentina, Bangladesh, Bolivia, Brazil, Chile, China, Guatemala, India, Japan, Jordan, Kyrgyz Republic, Malaysia, Mauritius, Moldova, Norway (risk), Pakistan, Poland, Russia, South Africa, Spain, Sri Lanka, Thailand, Türkiye (risk), Turkmenistan, Uruguay, Uzbekistan (risk), Vietnam (risk), and Zambia.

The following sections discuss common risk factors and employment practices identified across many geographic locations including the countries listed above where risks and situations of forced labor in the textile and apparel sector have been identified. These factors and practices are often interrelated and can compound each other.

3.1 Involvement of Labor Contractors, Recruiters, Agents, or Other Middlemen in the Labor Supply Chain

Labor contractors, recruiters, and other middlemen are common in textile and apparel supply chains, providing a range of services that enable the maintenance of a large, low-cost, and flexible workforce. In some contexts, such as in India, recruiters travel to rural, often impoverished areas and recruit workers (mostly women) for textile and apparel production work in more urban settings.³⁸ In other contexts, such as Malaysia, networks of labor recruiters recruit workers from countries such as Bangladesh, Nepal, and Indonesia for textile and apparel production work, often charging steep fees throughout the process which they sometimes attempt to cover up through coerced videotaped statements by workers.³⁹ Recruiters in the sector in Malaysia have also issued workers falsified receipts showing payment of

³⁷ Risk of or vulnerability to forced labor in the textile and apparel sector, as opposed to documented evidence of forced labor, is indicated by the inclusion of "(risk)" following the country in which the risk or vulnerability was reported.

³⁸ ["Textile workers in developing countries and the European fashion industry; Towards sustainability?" European Parliament Briefing, 2020.](#)

³⁹ ["Forced labor probe in Malaysia drives buyers to act \(original 2019 findings\)." Transparentem, Jun 2019.](#)

["Hidden Harm: Audit Deception in Apparel Supply Chains and the Urgent Case for Reform." Transparentem, Oct 2021.](#)

minimal recruitment fees, when in reality workers have paid many times the indicated amount.⁴⁰ Labor intermediaries have been known to falsify adolescent workers' identity documents, dental records, and medical records and coach them to lie about their age in order to place them in jobs as adults in textile and apparel factories.⁴¹

These practices increase workers' vulnerability to illegal wages and recruitment-related debt, especially among migrant workers who may have multiple dependencies on their employer (e.g. living in employer-controlled housing, owing advances on wages or loans, holding a visa tied to a single employer).⁴²

For migrants especially, the presence of middlemen opens workers to the possibility of deception in recruitment regarding the types and terms of employment they will be given, the total fees and expenses they will incur, and the conditions they will work and live under. These workers frequently must borrow money to obtain their jobs and end up earning less than promised, in some cases resulting in debt bondage,⁴³ and living in squalid housing provided by the factories where they work.⁴⁴ Middlemen also take advantage of workers living in poverty, as described in Section 3.1.1 below.

3.1.1 Illustrative Case

The garment industry of Mauritius is a significant destination for migrant workers from Bangladesh, who work in large numbers in the sector, primarily on temporary work visas. Verité research found evidence of forced labor in the course of interviewing 18 Bangladeshi migrant workers who had returned to Bangladesh from working in garment production in Mauritius. Their employment experiences pointed to numerous indicators of forced labor. Nearly all respondents reported being charged fees by labor agents in Bangladesh as a condition of obtaining employment in Mauritius, ranging from USD 445 to USD 2,840. In order to pay these recruitment fees, almost all respondents reported taking on significant debt,

⁴⁰ ["Hidden Harm: Audit Deception in Apparel Supply Chains and the Urgent Case for Reform." Transparentem, Oct 2021.](#)

⁴¹ ["Hidden Harm: Audit Deception in Apparel Supply Chains and the Urgent Case for Reform." Transparentem, Oct 2021.](#)

⁴² ["Protecting migrant workers from Forced Labor." ILO, May 2025.](#)

["Migrant Worker Tools and Resources." U.S. Department of Labor.](#)

⁴³ ["Garments and Apparel." United Nations University, 1 May 2024.](#)

⁴⁴ ["Forced labor probe in Malaysia drives buyers to act \(original 2019 findings\)." Transparentem, Jun 2019.](#)

amounting to about 6.2 months of their salaries before interest. The workers told interviewers that it took between three and 24 months to fully pay off their debts. They described the consequences of failing to pay back their debts as loss of their collateral, reputational damage that could hurt their chances for future employment or credit, and/or, in a few cases, the threat of physical violence. Many of the workers described the reality of their working and living conditions and wages as different from what they had been promised by agents during the recruitment process. Almost all reported that they could not terminate their employment contracts early without financial or other penalty, including loss of owed wages or benefits or loss of their personal documents.⁴⁵

3.2 Migrant Workers and Immigrants with Precarious Residency Status

Foreign migrant workers constitute a significant portion of the workforce across the garment producing regions of the world.⁴⁶ For many of these workers, their legal residency status in the host country is linked to their employment and can therefore be precarious. If their job is terminated prematurely and they are not repatriated as promised, or their passports are withheld, they can become undocumented (illegal) and subject to detention and deportation. These workers, many of whom are already in debt as a result of borrowing to pay fees to get their jobs, often face additional costs in these circumstances; payment is reportedly demanded to have their documents released or to cover the cost of their repatriation. The threat of termination is known to inhibit many of these workers from raising concerns, filing grievances, or advocating for their wellbeing or legal rights.

Undocumented (illegal) migrant workers are common in the textile and apparel sector in some countries, such as Thailand, where workers migrate irregularly from Burma, Cambodia, and Laos. This dynamic makes these workers more vulnerable to human trafficking.⁴⁷

⁴⁵ ["Forced Labor Vulnerability and Related Labor Rights Concerns for Bangladeshi Workers in the Garment Sector of Mauritius." Verite, Sept 2023.](#)

⁴⁶ [Suleymanova, Radmilla. "Are your favourite fashion brands using forced labour?" Aljazeera, 14 Jul 2021.](#)

⁴⁷ ["Textile workers in developing countries and the European fashion industry; Towards sustainability?" European Parliament Briefing, 2020.](#)

3.2.1 Illustrative Case

Foreign migrant workers in the apparel sector in Malaysia widely reported not having their passports in their possession. Factory staff kept them in guarded lockers in order to prevent workers from quitting, according to the workers. Workers were given keys to the lockers, however, to access their documents they were required to obtain approval and signatures from supervisors in a long and complicated process. In one case, a migrant worker's passport was not returned when he quit his job before the end of his contract, leaving him illegally present in Malaysia.⁴⁸ Foreign migrant workers in Mauritius' apparel sector have also reported passport withholding, hindering them in trying to negotiate an early end to their contract and arrange travel home, with one worker reporting that fines were charged to obtain the passport in the event of contract termination.⁴⁹

3.3 Workers Experiencing Poverty, Marginalization, and Absence of Alternative Income Options

Poverty, marginalization, and a lack of social capital among workers in the textile and apparel sector exacerbate the risk indicators described above. People living in poverty often lack social networks and relationships that would otherwise support their access to economic, employment, and educational opportunities. Jobs that are undesirable, dangerous, or otherwise difficult—and low-paying—are generally avoided by workers who have access to other options. The work is thus routinely done by individuals in extreme poverty, socially marginalized groups, immigrants who may not have local language fluency or transferable skills, and other minorities. Because they have little choice, these workers are more likely to accept terms that ultimately compel them to continue working, despite deceptive, exploitive, abusive, or unsafe practices. They are also more likely to engage in illegal activities to secure employment, such as being smuggled across national borders for promised jobs.

In the textile and apparel sector globally, workers often come from refugee, migrant, and marginalized communities and have few other employment options.⁵⁰ Minorities, including ethnic minorities, also

⁴⁸ ["Hidden Harm: Audit Deception in Apparel Supply Chains and the Urgent Case for Reform." Transparentem, Oct 2021.](#)

⁴⁹ ["Forced Labor Vulnerability and Related Labor Rights Concerns for Bangladeshi Workers in the Garment Sector of Mauritius." Verite, Sept 2023.](#)

⁵⁰ ["Garments and Apparel." United Nations University, 1 May 2024.](#)

["Syrian Workers in Turkey's Garment Industry. Looking Back, Moving Forward." Clean Clothes Campaign Turkey, Nov 2019.](#)

have a significant presence in global garment production, including Uyghurs and Tibetans in China⁵¹ and Muslims and members of Scheduled Castes in India.⁵²

3.3.1 Hazardous and Undesirable Work

Health and safety risks facing workers in the textile and apparel sector include chemical exposure, dust, poor ventilation, musculoskeletal stress, and noise exposure. Apparel and textile production, particularly sewing machine operation and hand sewing, often require workers to complete “highly repetitive and high-speed tasks,” as well as to remain in one posture for long periods of time. Workers who are paid at a piece rate may be incentivized to work far beyond what is safe in order to earn a basic wage.

Musculoskeletal disorders can lead to long-term disability. Certain processes are particularly hazardous; organic solvents used in finishing steps (the final mechanical or chemical processes applied to raw fabrics) can lead to neurological, central nervous system, and liver illnesses. Sandblasting, a process used to fade denim, has been found to cause the serious lung disease, silicosis.⁵³

Further, many apparel factories are housed in poorly maintained or constructed buildings, leaving them vulnerable to collapse. These risks are compounded when facilities are not adequately inspected, due to corruption or lack of capacity. In Bangladesh, the April 2013 Rana Plaza facility collapse—which killed 1,138 workers—has been largely attributed to corruption and negligence on the part of the government and factory owners.⁵⁴ Since 2021, 305 workers have died and over 1,000 have been injured in textile and apparel factories around the world.⁵⁵ These facilities are especially vulnerable to fires due to the use of highly flammable material.

⁵¹ [2021 Apparel and Footwear Benchmark Report. KnowTheChain, April 2021.](#)

⁵² [Kara, Siddharth. “Tainted Garments. The Exploitation of Women and Girls in India’s Home-based Garment Sector.” Blum Center for Developing Economies, Jan 2019.](#)

⁵³ [Bennett, Emma. “The hidden risks: health and safety in fashion.” IOSH Magazine, 6 Jan 2025.](#)

[Seidu, Raphael Kanyire et al. “A systematic review of work-related health problems of factory workers in the textile and fashion industry.” *Journal of Occupational Health*, 66 \(1\), 30 Jan 2024.](#)

⁵⁴ [Bennett, Emma. “The hidden risks: health and safety in fashion.” IOSH Magazine, 6 Jan 2025.](#)

[Seidu, Raphael Kanyire et al. “A systematic review of work-related health problems of factory workers in the textile and fashion industry.” *Journal of Occupational Health*, 66 \(1\), 30 Jan 2024.](#)

⁵⁵ [“Deaths and injuries in the global garment industry.” Clean Clothes Campaign.](#)

3.3.2 Home-based Workers

Home-based workers perform informal subcontracted work out of their homes rather than in employer-provided facilities during peak production seasons. The types of work most often performed include embellishment and embroidery as well as standard production tasks like cutting and stitching garments and thread trimming. Workers—typically women and girls—are paid based on the number of pieces they produce (piece rate), with contractors transporting completed products to export-oriented factories for the final finishing stages. While home-based work offers workers a degree of flexibility and protection from potentially abusive management practices at facilities, the work is by nature precarious, as it is often informal and unregulated.⁵⁶

In India, home-based garment work “is predominantly penny-wage labor” conducted by minority women and girls without written agreements.⁵⁷ Home-based workers have reported earning far less than minimum wage, having payments withheld, and lacking employment alternatives, leaving them to continue taking contractors’ orders.⁵⁸

3.3.3 Illustrative Cases

Bangladesh is a leading exporter of ready-made garments (RMG) and a key production country for the textile and apparel sector. Bangladesh also offers an abundant labor force, a light regulatory framework, and cheap labor; this combination makes it an attractive sourcing country for international corporations looking for low prices and fast production times. However, risks of labor abuses are high.

A 2025 report on forced and child labor in Bangladesh’s garment sector that surveyed 1,974 workers found that forced labor risks include excessive overtime (more than 10 hours per day, six days per week), payment below minimum wage, threats and abuse at work (intimidation, physical punishment,

⁵⁶ ["Forced labour and child labour in Bangladesh's garment sector: Documenting risks and informing solutions." University of Nottingham Rights Lab, Jan 2025.](#)

[Kara, Siddharth. “Tainted Garments: The Exploitation of Women and Girls in India’s Home-based Garment Sector.” Blum Center for Developing Economies, Jan 2019.](#)

⁵⁷ [Kara, Siddharth. “Tainted Garments: The Exploitation of Women and Girls in India’s Home-based Garment Sector.” Blum Center for Developing Economies, Jan 2019.](#)

⁵⁸ [Kara, Siddharth. “Tainted Garments: The Exploitation of Women and Girls in India’s Home-based Garment Sector.” Blum Center for Developing Economies, Jan 2019.](#)

verbal abuse, sexual assault), underpayment or non-payment of overtime, delayed payments and wage withholding, and discrimination.⁵⁹ Workers have a limited ability to address violations and mistreatment due to a lack of formal terms of employment (e.g. written agreements), effective grievance mechanisms, and worker representation avenues. These abuses are more common in the smaller subcontracted facilities that are often used for overflow production where due diligence (cascading of standards and monitoring) is typically weak. Further, low literacy levels among the workforce prevent workers from understanding how wages are calculated. Because many workers live at or below the international poverty line, the study determined that workers were experiencing abuse of vulnerability of individuals living below the poverty line, as they are too impoverished to decline or negotiate work. Some workers in the sector (373) report that “they would rather leave their current job, but they feel they must stay and keep working as they do not have other alternatives.”⁶⁰

The organizations SOMO (the Centre for Research on Multinational Corporations) and Arisa have documented indicators of forced labor in spinning mills in Tamil Nadu, India that produce yarn and fabric. Forced labor conditions are particularly evident among workers from low-caste and landless families who migrate from other regions of Tamil Nadu as well as from other states to work in the mills. Workers experience threats of financial penalties for leaving the job, wage withholding, retention of identity documents, recruitment-linked debt, excessive overtime, and debt bondage arising from advanced wages provided by spinning mills via recruitment agents. Among these workers, poverty, poor education, and a lack of employment alternatives are the primary motivating factors for taking a job in a spinning mill. Some take the job to pay pre-existing familial debt, sometimes taking an advance on their wages to do so. Workers experience deceptive recruitment, noting that the information they had been given about the working and living conditions was not what they experienced. Workers also often do not receive employment contracts, appointment letters, or pay slips so they have no information about the terms of their employment, wages, or deductions from their wages. Language barriers between workers

⁵⁹ ["Forced labour and child labour in Bangladesh's garment sector: Documenting risks and informing solutions." University of Nottingham Rights Lab, Jan 2025.](#)

⁶⁰ ["Forced labour and child labour in Bangladesh's garment sector: Documenting risks and informing solutions." University of Nottingham Rights Lab, Jan 2025.](#)

from other states and spinning mill supervisors native to Tamil Nadu further create communication challenges and isolate workers from management and the surrounding community.⁶¹

The Sumangali Scheme, a program that emerged in the 1990s in Tamil Nadu's textile industry, recruited young, often impoverished and low-caste women to work for three years in textile and spinning mills for a single lump sum payment provided at the end of the term, with the assumption that it would be used for a dowry payment. Increased scrutiny of this scheme from local NGOs, media, and international buyers has resulted in a shift in practice. As noted above, young female workers are often employed now with short-term contracts through labor intermediaries. Although the formal Sumangali Scheme is currently implemented less frequently, workers still face exploitation in the sector.⁶²

3.4 State-Imposed Forced Labor Programs

Forced labor can be imposed by the government of a country or by private actors. While most forced labor is the result of policies and practices of commercial entities (86 percent), 14 percent of forced labor around the world is imposed by governments.⁶³

State-imposed forced labor refers to forced labor demanded by government authorities, including as a means of:⁶⁴

- punishment, political coercion, or education (for example, abuse of compulsory prison labor);
- discrimination;
- punishment for participating in strikes;
- labor discipline; and/or
- mobilizing a work force for purposes of economic development.

⁶¹ ["International companies linked to forced labour in Indian spinning mills." SOMO, 26 May 2021.](#)

⁶² [Singh, Garima. "Gender, Caste and Labour: An Overview of the Sumangali System." Impact and Policy Research Institute, 22 Aug 2025.](#)

⁶³ ["Global Estimates of Modern Slavery: Forced Labour and Forced Marriage." International Labour Organization, Walk Free, IOM, Sept 2022.](#)

⁶⁴ ["Abolition of Forced Labor Convention, 1957 \(No. 105\)." International Labour Organization.](#)

It can take the form of state-sponsored labor programs that include labor transfers and/or compulsory work and is known to supply workers to the textile and apparel sector.

3.4.1 Illustrative Case

Forced labor has been widely documented in the Xinjiang Uyghur Autonomous Region (XUAR), where China's state-sponsored labor transfer program disproportionately targets Uyghur Muslims and other ethnic minorities, relocating workers to factories both within the XUAR and in other Chinese provinces.⁶⁵ Described by the Chinese government as "vocational training" or "poverty alleviation" efforts to increase job opportunities and economic growth for the region, investigations report that many Uyghurs and others are subjected to surveillance, restricted movement, and harsh working conditions in the XUAR and other regions of China. Lack of transparency, including obstacles to credible social auditing, makes it difficult for international companies to trace the origins of their materials or the conditions under which work is performed.⁶⁶

China is one of the largest producers of cotton, a key input for the textile and apparel industry, with production highly concentrated in the XUAR. Cotton produced in the XUAR has been linked to state-imposed forced labor; it makes its way into global textile and apparel supply chains in the form of cotton yarn and fabric.⁶⁷ Due to the crucial role that XUAR cotton plays in the global textile and apparel supply chain, it is estimated that 1 in 5 cotton garments available in the global apparel market "are at risk of being tainted with Uyghur forced labor."⁶⁸ Beyond cotton, several Chinese apparel companies are connected to the XUAR through sourcing practices, subsidiaries, and direct manufacturing operations that employ forced labor.⁶⁹

⁶⁵ ["Against their will: The situation in Xinjiang \[Fact sheet\]." U.S. Department of Labor, Bureau of International Labor Affairs, 2020.](#)

⁶⁶ ["Asleep at the Wheel: Car Companies' Complicity in Forced Labor in China." Human Rights Watch, 1 Feb 2024.](#)

⁶⁷ [Carlson, Dylan and Marin Weaver. "Disentangling the Knot: Identifying U.S. and Global Exposure to Xinjiang Cotton." Office of Industries Working Paper, Oct 2022.](#)

⁶⁸ ["Apparel and Textiles." Coalition to End Forced Labour in the Uyghur Region, Jul 2025.](#)

⁶⁹ [Hawkins, Amy. "'Substantial volume' of clothing tied to Uyghur forced labour entering EU, says study." *The Guardian*, 6 Dec 2023.](#)

[Seppala, Johanna. "Uyghur Forced Labor in the Xinjiang Textile Industry: Case Study 'XT'." Research Days Posters, Binghamton University 2021.](#)

4. Recommendations: Due Diligence Steps to Address Risks

4.1 Conclusions

This report examined the forced labor risks in the operations and supply chains of companies operating in the textile and apparel sector, focusing specifically on the supply of labor.

The risks of exploitation of workers trace, in most cases, back to the supply chain structure and purchasing practices of the textile and apparel sector; inadequate due diligence processes of third-party services providers, labor agencies, and suppliers; deceptive and exploitive recruitment processes that result in worker debt and compound other risk factors for migrant workers; the use of workers in state-imposed forced labor, and the unique hazards of textile and apparel production work.

Companies should view the contents of this report as a starting point and seek to further develop their understanding of the specific weaknesses and risks in their supply chains at all tiers, in order to implement dynamic and ongoing risk assessments and mitigation strategies.

The findings largely point to potential gaps in companies' due diligence systems or approaches to managing risk. The following recommendations for addressing these potential process gaps offer textile and apparel entities practical guidance for implementing comprehensive measures to control forced labor risks and protect their operations and individuals who may be vulnerable to exploitation within their supply chains. Effective due diligence requires a systematic approach that integrates risk assessment, prevention and mitigation, capacity building, and monitoring. This involves developing comprehensive frameworks that can identify and address potential forced labor indicators across diverse operational contexts. The goal is not merely to achieve compliance but to create sustainable systems that protect vulnerable populations and prevent forced labor while maintaining operational efficiency and competitive advantage.

The ResponsibleSourcingTool.org site overall and the [Due Diligence Toolset](#) specifically provide technical tools to support the implementation of the following recommendations. The Toolset and recommendations that follow are aligned with the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Due Diligence Guidance for Responsible Business Conduct](#). Tool 1 of the Toolset provides a model of effective practice due diligence program for identifying potential risks of human trafficking

within a supply chain, evaluating and prioritizing identified risks, implementing solutions, and monitoring and improving supplier performance over time.

4.2 Recommendations

4.2.1 Policy and Embedding Forced Labor Prevention Standards and Practices in Business Functions

- 4.2.1.1 Companies should include a clear prohibition against forced labor in their Codes of Conduct and supplier performance standards. (See [Tool 2](#).) This should include the “employer pays” principle, which requires that all fees and expenses relating to the recruitment and placement of a worker are paid by the employer.
- 4.2.1.2 The policy should be clearly communicated to all business entities, including third-party service providers and labor agents, and included in business contracts. (See [Tool 5](#).) The contracts should also require that the policy be cascaded to the suppliers’ suppliers.
- 4.2.1.3 Procurement staff should be formally assigned, trained, and supported to screen prospective suppliers, including third-party service providers and labor agents, for their commitment and capacity to meet the policy standards on avoiding forced labor. (See [Tools 3, 7, and 8](#).) There should be clear consequences established for supplier performance on achieving the standards.
- 4.2.1.4 Review of a supplier’s management of forced labor risks should be incorporated in regular supplier engagements, such as quarterly business reviews, quality audits, and other existing supplier management processes.

4.2.2 Risk Assessment and Prioritization

- 4.2.2.1 Conduct a combined supply chain mapping and forced labor risk assessment as a key first step in creating a targeted strategy for segmenting and prioritizing risks to address. (See [Tool 6](#).) High level risk factors to consider include characteristics of country of operation, product or production processes involved, and workforce demographics (e.g., prevalence of migrant workers). Other factors to consider include a company’s ability to

influence suppliers based on volume/spend and the degree of harm to people that practices may cause.

4.2.3 Needs Assessment and Capacity Building

4.2.3.1 Based on the results of a risk assessment, companies should conduct deep dives (e.g., targeted research, risk assessments, rapid appraisals, supplier assessments) to develop and implement action plans to address the underlying causes of identified risk or issues. The activities, which should be informed by clear objectives and measurable success indicators, may range widely from supplier training to engagement in multistakeholder initiatives where companies individually lack the leverage to drive positive changes in an operating environment (e.g., where economic or political factors are immovable in the immediate term). (See [Tools 8, 10, and 11](#).)

4.2.4 Monitoring

- 4.2.4.1 Companies need to routinely evaluate whether they are implementing their due diligence processes as planned (e.g., new suppliers screened for forced labor risks, review of corrective action plans during regular supplier business reviews). (See [Tool 9](#) and the Supply Chain Due Diligence Process.)
- 4.2.4.2 The effectiveness of due diligence activities should be tracked to ensure the desired impacts are on target and sustainable (e.g., worker-paid recruitment fees are avoided, foreign migrant workers are in full control of their identification documents, workers have access to remedy).