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Accounting for modern slavery risk transparency in Nigerian businesses: Institutional context, disclosure and the way forward

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Building on previous work published in *BESS*® on modern slavery practices, an international team of Australian and Nigerian researchers argue that modern slavery must be investigated and tackled in the context of local developing country conditions, using Nigeria as a case study.

1. Introduction

Nigeria is a developing country that has faced many social, economic and environmental problems for years. As the most populous country in Africa, with 226 million people as of 31 December 2023 and an average age of 18 years, it also has 84 million people who live below the poverty line, representing the second-largest poor population of any country in the world.[1] Social services are inadequate and sometimes non-existent, and corruption presents a constant problem. For example, Transparency International (2022) gives Nigeria 24 out of 100 in its Corruption Index with an overall ranking of 150 out of 180 countries worldwide. Crime is high, and the abuse of human rights within the country is a daily occurrence. This has been exacerbated by events such as the COVID-19 pandemic[2] and ongoing internal conflicts with groups like Boko Haram and Islamic State West Africa Province (a splinter of Boko Haram).

1. World Bank, 2023a; Worldometer, 2024
2. Christ and Burritt, 2021

Human rights abuses have been documented in numerous areas, including at the hands of official security forces.[3] The authorities have curtailed free speech, freedom of expression, and the right to peaceful assembly. Censorship is a common way to protect the government and keep people in line. Set against such challenging content, sustainability, as currently viewed and debated in the West, is unlikely to be high on anyone's agenda. However, developing a better understanding of sustainability in countries like Nigeria is crucial if, as conceptualised by the United Nations (UN) Sustainable Development Goals (SDGs), it will ever be realised globally. Sustainability should not be a luxury only enjoyed by those fortunate enough to live in countries like the US, UK, Canada and Australia; it should be universal.

Although there are many environmental and social problems facing Nigeria, this study is primarily concerned with human rights, particularly work and modern slavery, one of the most abhorrent crimes against humanity.[4] SDG Goal 8 specifically addresses this issue, focusing on economic growth linked to decent work.[5] Target 8.7 takes SDG 8 further by urging all countries and organisations to: 'Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms'.

One way in which modern slavery can be addressed is via reporting and transparency, with this approach favoured by several Western countries, including Australia, the UK and Canada. Although the 2025 deadline set down by the UN will remain unmet, if this goal is to be eventually realised, even in the long run, it is not enough for Western governments to pass laws imposing transparency and, in some cases, due diligence on large companies in the hope of a trickle-down effect that might eventually benefit people in developing countries positioned at the beginning of the product and labour supply chains. Instead, modern slavery must be investigated in the context of local developing country conditions regarding cultural and economic challenges faced, and a local researcher must preferably be involved who understands conditions and customs on the ground. The current research is encouraged to do this in the context of accounting for modern slavery in Nigeria, as only six specific developing country studies have been identified – Argentina, Bangladesh, China, Ghana, Pakistan and Turkmenistan[6] – and they each only look at one industry.

Modern slavery in business operations and supply chains describes a set of human rights abuses that involve *controlling* a victim through means such as threats of or actual use of violence against victims or their families, deception, removal of documentation to stop mobility, imprisonment, sexual exploitation starvation and torture.[7] In comparison, traditional slavery was based on the *ownership* of another person as a chattel. Ownership, which provided the legal right to buy, sell and account for an enslaved person as property, existed on the African continent for years, but chattel slavery is now illegal in Nigeria.[8] Nonetheless, estimates suggest not only that modern slavery is rife in Nigeria, but that the government is doing very little to combat it. In addition, Nigerian businesses have no specific reporting obligations when it comes to human rights and modern slavery.

3. Amnesty International, 2022
4. Guthrie et al., 2022
5. Christ et al., 2020; Christ et al., 2022
6. Strand et al., 2023
7. International Labour Organization (ILO) and Walk Free Foundation, 2017; Pierce, 2011
8. Akor, 2011

The Nigerian Stock Exchange (NSE) does have a listing requirement that companies incorporate sustainability information as part of their annual reporting activities, which should include: 'ethical procurement practices which address transparency, confidentiality, fairness, child labour, corruption, conflict of interest, support for SME and women-owned businesses, forced labour, social responsibility and Health & Safety'[9] but a lack of clear prescription may limit its overall effectiveness. This means any modern slavery-related reporting occurs in a virtually voluntary setting. Thus, it is inappropriate to generalise from modern slavery studies conducted in the West against the backdrop of modern slavery legislation to the complicated context of Nigeria. Nigeria represents a unique setting that, along with other developing countries in Africa and beyond, needs to be separately investigated and theorised.

The purpose of this paper is to consider modern slavery disclosure as a sub-set of sustainability accounting in the Nigerian context. Drawing on Crane's theory of modern slavery,[10] the paper will theorise how the Nigerian setting allows modern slavery to perpetuate and how this might influence how Nigerian companies engage with modern slavery accounting and reporting. The discussion will then turn to the potential for 'circuit breakers' to disrupt the model presented by Crane[11] and improve action aimed at eradicating modern slavery in the Nigerian context. In doing so, the following research questions will be addressed:

> **RQ1:** In what ways is the current setting in Nigeria likely to facilitate and perpetuate modern slavery in business operations?
>
> **RQ2:** To what extent are Nigerian companies openly recognising and engaging with modern slavery through their corporate disclosures?
>
> **RQ3:** What actions might be needed to overcome or minimise the impact of the complex Nigerian setting when addressing modern slavery risk in business?

The paper is structured as follows: In section 2, Crane's theory related to the Nigerian context is explained. Section 3 details the research method used and the source of evidence gathered. Section 4 provides results of a thematic content analysis of modern slavery practices of top Nigerian companies. Section 5 discusses the findings in the Nigerian setting. A brief conclusion and directions for future research are presented in Section 6.

2. Crane's theory and the Nigerian context

In a bibliometric study of meta-literature on modern slavery published between 1999 and 2021, Mehmood et al.[12] found and analysed 280 papers. Their results show that Andrew Crane has by far the highest number of citations, with 148, nearly 50% ahead of his nearest rival. As 134 of these citations relate to Crane,[13] they conclude that he has the most influential publication on the topic. Crane[14] provides a seminal theoretical management framework for understanding settings where modern slavery is practised within organisations. Conditions enabling slavery are captured in Figure 1 of Crane,[15] with five main contextual institutional conditions being identified: industry, socioeconomic, regulatory, cultural and geographic. A fundamental indirect basis for assessing these is through national statistics and international

9. NSE, 2018, p.18
10. Crane, 2013
11. Ibid.
12. Mehmood et al., 2023
13. Crane, 2013
14. Ibid.
15. Ibid.

government and non-government organisations. Modern slavery in Nigeria is systemic, with the 2023 Global Slavery Index suggesting that more than 1.6 million people are currently living in slavery conditions within the country.[16] Despite an increasing number of annual labour inspections conducted by the Ministry of Labour and Employment, the problem remains a pervasive part of life for many citizens.[17] This means it is necessary to understand the context in which modern slavery in Nigeria occurs. With this in mind, the five areas identified by Crane are now examined in the Nigerian setting to see how these contexts may facilitate and perpetuate modern slavery in business operations and supply chains in Nigeria. In doing so, research question 1 is addressed.

2.1 Industry Context

Literature indicates that the type of industry is an important consideration when examining the presence, facilitation, and perpetuation of modern slavery in business operations and supply chains.[18] Specific industries are observed to have a high risk of modern slavery. These are identified by Strand et al.[19] as 'non-technological, traditional work such as agriculture, mining, textile manufacture, construction and fishing', especially those that are labour-intensive and low-skilled. Recognition of the pervasiveness of modern slavery has also recently placed focus on the role of the finance industry in modern slavery.[20]

The industry context in Nigeria helps facilitate modern slavery in several ways. The Nigerian workforce is primarily focused on subsistence agriculture (farming, forestry and fishing comprise 30% of the workforce), services (52%) and other industries (13%), plus a small amount of manufacturing (5%).[21] Nevertheless, in terms of work, 88% of workers in Nigeria are self-employed in their businesses, with 93% working in the informal economy,[22] which locks low-cost labour into business models.[23]

Most informal workers work in micro, small and medium-sized businesses, petty trades and other forms of individual economic activity, and they mostly have no contractual arrangements,[24] thereby increasing their vulnerability. Only about 12% are wage employees, making them susceptible to modern slavery practices in these high-risk agricultural (e.g., cocoa beans and oil palm fruit) and services (e.g., retail, hospitality, transport, IT, financial services and communications) industries.[25] This is particularly the case when working in the upstream supply chains of large domestic and international companies.

2.2 Socioeconomic Context

The World Bank suggests that classifying countries as developing or developed using economic measures is insufficient as concern for sustainability issues, including social, environmental and governance aspects, grows in importance.[26] This has led to a combination of economic and human measures of development (life expectancy at birth, years of schooling, and Gross National Income per capita) coming into broader use, with developing

16. Walk Free, 2023
17. Ibid.
18. Crane, 2013; Gold et al., 2015
19. Strand et al., 2023, p. 10
20. United Nations University, 2019
21. Statista, 2023
22. National Bureau of Statistics, 2023
23. Crane, 2013
24. Folawewo and Orija, 2020
25. Adelakun, 2019; Statista, 2023
26. World Bank, 2023b

economies having low measures across these dimensions.[27] Nigeria has low human development (ranked 163 of 191 countries), even when adjusted for planetary pressures per capita, such as carbon dioxide emissions and its material footprint.[28] This is a long way from assessing all aspects of development over time, including governance, but it is a starting point. For example, countries with the highest human development index measures are now moving into the fourth industrial revolution (Industry 4.0).[29]

Nigeria has benefitted little from its vast mineral wealth as other national states and transnational nationals take the wealth away from the Nigerian people.[30] Also, few gains have eventuated from the previous industrial revolutions and seem to be being left behind again.[31] A specific indication of the applicability of this criterion for development is provided by IMD's World Digital Competitiveness Ranking (WDCR),[32] which measures the capacity and readiness of 64 economies to adopt and explore digital technologies as a critical driver for economic transformation in business, government and broader society. There is a high correlation between the WDCR and the classification of developing countries. A few African countries, such as Botswana (*#60*) and South Africa (*#58*), previously classified as having developing economies, are included. Nigeria has not progressed to the list, which looks bad for the prospects of human development, despite enthusiasm for lessons in sustainable entrepreneurship that could be learnt from the European Union and Australia.[33] Nevertheless, 91% of people in Nigeria are estimated to subscribe to a mobile cellular phone.[34]

2.3 Regulatory Context

Within Africa, the highest prevalence of modern slavery is in Nigeria,[35] pervading its industries and agriculture.[36] The Global Slavery Index estimates there to be 1,611,000 people being held in slavery in the country,[37] more than the total number of the 16 other West African countries together. Thus, it serves as a valuable case to examine.

Modern slavery, a form of criminal behaviour that is often hidden, is being addressed in Nigeria through legislative measures aimed at criminalising various types of human trafficking, including forced, child, and bonded labour, aligning the nation's laws with European standards.[38] Nigeria has also ratified international agreements such as the UN Slavery Convention of 1926, the Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Similar Institutions and Practices of 1956, as well as the International Labour Organization (ILO)'s Conventions on Forced Labor and Child Labor. Furthermore, Nigeria is dedicated to achieving the SDGs, particularly target 8.7, which focuses on ending modern slavery.[39] The country's Tier 2 classification, according to the US Trafficking Victims Protection Act, reflects considerable efforts in combating human trafficking.[40]

27. UN Development Program (UNDP), 2023
28. UNDP, 2023, Table 7
29. Burritt and Christ, 2016; Tiwari and Khan, 2020
30. Lucas et al., 2024, forthcoming
31. Adepetun, 2019
32. IMD, 2023
33. Ogunlela, 2023
34. Central Intelligence Agency, 2023
35. Walk Free, 2023
36. Obarisiagbon and Ijegbai, 2019
37. Walk Free 2023
38. Ibid.
39. UN, 2021
40. US Department of State, 2021a

Another possible indirect voluntary influence on modern slavery reporting practices is accounting standards. Formal, mandatory oversight has been established by the Financial Reporting Council of Nigeria under the Financial Reporting Council (FRC) Act No. 6 of 2011 as a governance mechanism to align accounting services with best international practices in the face of global financial scandals.[41] It is a disappointment but not unexpected to see that there has been little concern for social and environmental risks in the past, as the necessary focus on reducing corruption through improving the credibility of financial reporting supported by external audits has taken centre stage. Instead, through alignment with International Financial Reporting Standards (IFRS), there is an emphasis on helping smaller businesses build financial credibility to access credit and fit into the global finance markets to encourage investment in multinational companies. Although at COP27, a commitment has been made by the Financial Reporting Council of Nigeria to adopt the IFRS sustainability standards, these have yet to address modern slavery risks.[42]

2.4 Cultural Context

Crane[43] identifies traditions, entrenched inequalities and religious beliefs as cultural factors embedding modern slavery. The complicated history of slavery in Africa is such that the role of tradition should be considered first. Although the Transatlantic Slave Trade is often front of mind when people think about slavery in Africa, this is only a recent example of a problem that goes back generations. Quirk[44] provides a helpful historical window on modern slavery. He identifies that cult slavery has predominantly been concentrated in western Africa, which includes Nigeria. Slavery has existed for thousands of years and has been considered entirely legitimate, including by religious institutions, socially necessary and economically valuable. In this context, the legal movement against slavery as a historically entrenched institution appears as an anomaly. Anti-slavery proponents viewed ownership of human beings and extreme dominion and exploitation as an 'unconscionable evil',[45] but even though, legally, slavery is a crime, local cultural circumstances mean that extreme forms of exploitation persist in modern slavery.

Inequalities against women are entrenched in the democratic governance process in Nigeria. It has been the tradition under the Nigerian Constitution (1999) for women to be under-represented. Ongoing attempts to overcome this have been made but blocked.[46] Although women's rights are legally protected, inequalities in representation exist partly because women dominate the poor in Nigerian society and, as a result, are uneducated about political processes, have lower access to resources[47] and are more likely to fall victim to modern slavery practices.

For example, in the Nigerian context, there are entrenched inequalities between men, women and children. In Nigeria, the vast majority of people are young, with a median age of 18 years and 43% under the age of 15,[48] and as part of Nigerian culture, younger people are not expected to disrespect or challenge the authority of the elderly. This restricts young girls informally working in bars from confronting abusive customers. This cultural tradition fuels the vulnerability of underage

41. Herbert et al., 2016
42. IFRS, 2022
43. Crane, 2013
44. Quirk, 2006
45. Ibid.
46. Ogunniran, 2015; Omotoso, 2023
47. Omotoso, 2023
48. World Bank, 2021

waitresses as suitable targets for abuse, especially sexual harassment.[49]

The role of gender inequality within Nigeria also has implications related to wider employment opportunities. A report on gender barriers in the country published by Jobberman Nigeria[50] found that institutional and cultural barriers are forcing more women to accept work in the informal sector, as work in the formal sector is restricted. Although Western literature often describes informal work as being associated with an increased risk of becoming trapped in modern slavery (as described above), in the case of Nigeria it has also been argued that informal employment can provide a means for women to improve their situation in life and to foster innovation in ways that are not otherwise possible in discriminatory formal settings.[51] Nonetheless, the ILO[52] has put forward a Recommendation on the Transition from the Informal to the Formal Economy, 2015 (No. 204) in which they encourage countries to move towards more formalised forms of employment for all citizens. How this might work in a country like Nigeria, where gender discrimination is systemic, remains to be seen.

Religious institutions, which can be used to facilitate the faith of individuals and communities, are prominent in Nigeria and possess considerable power in reinforcing practices that subordinate women and provide higher authority to men.[53] The religious context for understanding modern slavery facilitation and perpetuation in Nigeria is complex, because over 300 ethnic groups and 500 languages and different religions were originally forcefully welded together 'for administrative convenience' by Britain.[54] Nigeria is dominated by African traditional, Christian and Islamic religions, each with different strands, sub-categories and interactions between them.[55] All have been involved with chattel slavery in the past, and these religious beliefs also have a strong influence over the perpetuation of modern slavery in Nigeria. For example, many trafficked Nigerian women participate in a traditional ceremony with a juju priest and some traffickers exploit this tradition and tell the women they must obey their traffickers, or a curse will harm them, which prevents victims from seeking assistance or cooperating with law enforcement.[56] Kitause and Achunike[57] argue for the importance of religion in every Nigerian's life and that 'All of these [religions] culminated in the fight against all forms of corruption, injustice, molestation of the girl child and the advocacy for women empowerment to enhance the dignity of the human person in Nigeria'. Nevertheless, they see success as limited as they paint a picture of the battles between the religions, which have led to 'immorality, homosexuality, lesbianism, incest, rape, armed robbery, terrorism, assassination, kidnapping, divorce, abortion, examination malpractices, *god-fatherism*, intolerant, tribalism, corruption, religious crisis and the like…with Christians and Muslims topping the lists as culprits'.[58] There is no specific mention of modern slavery, but in this context, its presence in the practices of business and engagement through trafficking is no surprise either.

49. Aborisade, 2022
50. TechCabal, 2022
51. Ibid.
52. ILO, 2015
53. Elabor-Idemudia, 2003
54. Ugbam, 2014, p. 66
55. Kitause and Achunike, 2013
56. US Department of State, 2021b
57. Kitause and Achunike, 2013, p. 53
58. Ibid., p. 51

2.5 Geographic Context

Nation states in Africa, Central and South America and Southeast Asia are recognised as the primary source of modern slavery in the world, mainly because relative economic poverty combined with poor education makes workers open to easy replaceability, job insecurity and exploitation.[59] The Walk Free[60] modern slavery vulnerability index for Nigeria is 76 in every 100 people, which, according to their Report, is the highest absolute number in Africa. According to UN Office on Drugs and Crime (UNODC),[61] women and children are the most vulnerable groups. They are trafficked internally and externally for economic and sexual exploitation, such as prostitution, forced labour, domestic servitude, alms begging, the drug trade, child soldiers, forced marriage, organ transplants, etc. In addition to all of these actions, Nigeria is not helped by the presence of armed conflict in some areas, particularly the Northeast, through the activities of Boko Harem, as this increases the trafficking of people. Up to one million people are trafficked annually in Nigeria, with 75% of this internally between Nigeria's 36 States and only 2% trafficked outside.[62]

Nonetheless, Nigeria is performing well relative to other African countries and, in recent years, has had the strongest response to modern slavery in Africa.[63] For example, the Ministry of Labor and Employment conducted 17,026 labour inspections found 2,274 violations of child labour laws and removed 475 children from potential trafficking conditions; this compared with removing 1,193 children from potential trafficking conditions during the previous reporting period.[64]

To research modern slavery in the Nigerian setting, it is first necessary to understand the context in which Nigerian businesses operate, which is different from the Western countries in which modern slavery-related legislation dominates. Based on Crane's[65] theory of modern slavery, it can be seen that Nigeria faces several contextual institutional conditions with the potential to contribute to and insulate companies and perpetrators from efforts designed to tackle the problem. To improve information for policy, it is now necessary to turn to what Nigerian businesses are actually doing or say they are doing in relation to this issue (RQ2). Even in such a complex setting, it can be argued that large corporations are likely to respond first to external pressures related to addressing and potentially reporting on modern slavery. Regardless of the actual response, collecting such evidence is to provide a first benchmark of the corporate response in Nigeria for the future. In conjunction with Crane,[66] this benchmark can then be used to identify potential circuit-breakers that can be utilised to mitigate the challenging social and institutional setting and moderate the impact of such conditions and how they contribute to the pervasiveness of modern slavery in Nigeria (RQ3).

Finally, the potential importance of the practices and disclosures of multinational companies operating across countries must be considered, as they can trickle down international practices to smaller businesses in the supply chain.

3. Research method

With general contextual information about modern slavery in Nigerian businesses emerging from available statistics, exploration of the core

59. Walk Free, 2023; WorldData.Info, 2023
60. Walk Free, 2023
61. UNODC, 2023
62. Ibid.
63. US Department of State, 2021b; Walk Free, 2023
64. US Department of State, 2021b
65. Crane, 2013
66. Ibid.

content and operationalisation in companies is needed to reveal more granular information.

With granularity in mind, this section discusses the data sources and methods used for the analysis of modern slavery disclosures made by big business in Nigeria, and addresses RQ2. The focus on large business organisations is pertinent, as large organisations often lead the way when it comes to the recognition of sustainability-related issues. They are also among the first to face regulation and public scrutiny within their home countries and beyond.

3.1 Data Source

To understand the landscape when it comes to identifying and addressing modern slavery risk in Nigeria, a baseline for current disclosure practices is needed. Crane[67] suggests certain factors can moderate the relationship between the conditions already described that enable slavery in the first place and the exploiting and insulating capabilities that allow it to continue. One of these relates to supply chain interventions and another to the deployment of private and civil regulation. An example of how this might be relevant in the Nigerian context relates to efforts exerted by large chocolate companies such as Mars and Kraft, who have used their supply chain power to fight forced labour and improve conditions in the West African cocoa industry.[68]

The problem of modern slavery in corporate supply chains has motivated some jurisdictions to require large entities to provide information on modern slavery-related activities and report data about actions taken to address modern slavery in their operations and supply chains.[69] Although such reporting is not a requirement in Nigeria to establish and maintain legitimacy with customers and other stakeholders, companies may be encouraged to adopt modern slavery reporting practices.[70] This study focuses on disclosures of the top 100 of 156 companies listed on the NSE, based on their market capitalisation.[71] Market capitalisation is the major measure used by stock exchanges to rank the top companies. It has been adopted in this research on the basis that where stock exchanges exist, marketplace size makes action on modern slavery consequential for corporate supply chains.[72] The stock market is highly concentrated, with the top 15 companies accounting for 90% of market value.[73] Reports for 2020 provide the latest comparable set of data available, which were selected for analysis. Nigeria has a low base and is one of only a few African countries where mandatory annual reporting is required for listing, with standalone reports being voluntary.

3.2 Data Collection and Method of Analysis

Data was collected for the top 100 companies listed on the NSE from three primary corporate sources – annual reports, sustainability reports or equivalent, company websites – and two other sources – supplier codes of conduct and human rights statements. The following sectors dominate the list: financials (45%), consumer goods and services (22%); industrials (12%), and oil and gas (8%). Oil and gas reserves are legally the property of the Nigerian Federal Government and account for 76% of federal government revenue and 40% of the country's GDP.[74]

Of the top 100 companies listed on the NSE, annual reports were only freely accessible for

67. Crane, 2013
68. Ibid.
69. Pinnington et al., 2023
70. Stevenson and Cole, 2018
71. https://ngxgroup.com/exchange/trade/equities/listed-companies
72. Flynn and Walker, 2020
73. Vanguard, 2020
74. Rainforest Rescue, 2024

85 of them. In addition, data was available in 26 sustainability reports and on 35 websites making sustainability-related disclosures. To some extent, this situation reflects the NSE listing rules, which allow sustainability reporting either in standalone reports or as a sub-section of annual reports. Where companies do not publish a separate sustainability report, discrete (albeit limited) sustainability sections are found within the Annual Report of 20 companies. However, the information is not presented in an integrated way. Ten companies disclosed a supplier code of conduct, and 18 produced a human rights statement. Only 42 companies included a search function on their website which greatly increased the time commitment needed to ensure every section of a website was reviewed and relevant information recorded.

Based on themes extracted from the disclosure sources, content analysis provided the foundation for analysis. The metric used by Christ et al.[75] was adopted as the research instrument for assessing the main themes and sub-themes disclosed (see Table 1, Columns 1 and 2) and, as revealed by the literature, is generic for developed and developing countries. Content analysis is a prevalent method for analysing modern slavery reporting as an aspect of sustainability reporting.[76] It is a research technique for the inter-subjectively comparable description and analysis of the communicated content. Reports were downloaded, and each one searched for content about five main themes and 14 modern slavery sub-themes relating to modern slavery risks in corporate supply chains (see Table 1), through coding of 1 if disclosed and 0 otherwise. The search process involved two authors working with a protocol to interpret observations within the reports and websites. To further ensure there were no country or culturally specific areas that might be missed by using a disclosure index originally developed in a Western country context, both authors carefully considered the nature of all disclosures for areas that were not automatically covered. No such areas were found.

First, the top 100 companies on the NSE were identified and recorded on an Excel spreadsheet; then, their websites were identified, with author 1 locating the top 50 addresses and author 3 recording companies 51–100 sites. These websites were then confirmed in reverse, such that all websites were double-confirmed as correct. This first step was significant because of the problems associated with many online warnings that access to these sites would be insecure and was not advisable. The two researchers persevered, and finally, only one site was confirmed to be completely inaccessible, #38 Honeywell Flour Mills, despite many attempts to access the data over one month. A second step was for the two authors to check and countercheck how many companies had built-in search functions on their websites to assess the time involved in the interrogation of websites. This varied between 20 minutes for the well-developed sites and 90 minutes for the less user-friendly sites. Step three of the protocol was to agree on whether companies had published 2020 annual reports and sustainability reports on their websites. The top 50 companies were examined by author 1 and the second 50 by author 3. A crosscheck was then made to ensure that nothing was missed. In this process, a Krippendorff's alpha was initially calculated. However, as cross-checks between the authors confirmed where any reports had been missed or could not be found, this degree of sophistication was not considered necessary and abandoned.

75. Christ et al., 2019
76. Asuquo et al., 2018

TABLE 1: Content Analysis Themes, Sub-themes and Results – Supply Chain

Theme	Sub-Theme	Number of Disclosures: Annual Report	Sustainability Report	Website	Total	%	Ranking
1. Human rights in the Supply chain	a. Child Labour	14	9	10	33	10.28	=3
	b. Forced Labour	11	10	10	31	9.66	6
	c. Trafficking	5	2	4	11	3.43	=12
	d. Minimum Wage	5	3	4	12	3.74	11
	e. Human Rights	21	11	8	40	12.46	1
Total					**127**	**39.56**	
2. Health & Safety in the supply chain	a. Health & safety	19	10	6	35	10.90	2
	b. Abuse & Violence	4	2	5	11	3.43	=12
Total					**46**	**14.33**	
3. Supplier assessment	a. Screening	7	5	2	14	4.36	10
	b. Risk assessment	8	6	2	16	4.98	=8
Total					**30**	**9.35**	
4. Supplier code of conduct	a. Diversity & Equal opportunity	3	1	4	8	2.49	14
	b. Whistle Blowing	18	8	6	32	9.97	5
	c. Bribery & Corruption	17	9	7	33	10.28	=3
	d. Code of conduct	12	8	9	29	9.03	7
Total					**102**	**31.78**	
5. Modern slavery	a. General	7	5	4	16	4.98	=8
Total					**16**	**4.98**	
		151	**89**	**81**	**321**	**100.00**	

* Additional results concerning influence of other jurisdictions on disclosure and sector disclosure differences are available on request from the corresponding author.

The fourth step was for interrogation of the identified reports and websites, this time reversing the order with author 3 searching for the 14 search terms listed as sub-themes in Table 1, for each of the three sources for each company. A yes/no record was documented on the spreadsheet for each of these possible items. Where an observation was identified, the relevant sentences were recorded in a searchable word file, with the source and page number being recorded for each instance discovered. Authors 1 and 3 then checked each other's recordings in the file. Where there was disagreement, each instance was discussed, and an agreed classification was recorded. Two main issues were discovered and reconciled between the authors. Sometimes, a sentence was recorded in the Word file and noted as a Yes on the Excel spreadsheet when it did not specifically relate to modern slavery characteristics in supply chains. For example, bribery and corruption policies occasionally did not relate to suppliers. However, it may have been linked with partners, and a double check was made whether partners did or did not include suppliers. During this interrogation, modern slavery in supply chain disclosures were also classified on the spreadsheet based on whether they were qualitative or quantitative and whether a Supplier Code of Conduct and a Human Rights statement were available online. The data having been gathered was then available for analysis.

Further to the above, and as part of collecting the data, all relevant disclosures and any surrounding information required to understand them or put them into context were also collated, cut and pasted into a searchable Word document arranged by company and listing order. In order to supplement the content analysis, which was designed to provide a high-level overview of the current state of modern slavery supply chain reporting in Nigeria, these disclosures were then interrogated by two of the researchers, in total, in a thematic way based on induction with a focus on manifest or semantic meaning. The direct quotes for analysis amounted to 20,957 words, showing how limited disclosure on modern slavery currently is. Nonetheless, this did allow the researchers to review all the information in full and discuss potential themes and areas of interest.

4. Results for modern slavery disclosures

4.1 Content Analysis – Descriptive Statistics

Descriptive statistics provide the foundation for addressing RQ2: To what extent are Nigerian companies openly recognising and engaging with modern slavery through their corporate disclosures? Descriptive statistics reveal quantitatively how the top 100 listed companies in Nigeria make disclosures about modern slavery in their supply chains. The overall results indicate a low level of disclosure. Table 1 (Column 6) shows that of the 4,200 total technically possible disclosures that could have been made (i.e., three possible forms of media for disclosure X 14 possible sub-themes X 100 companies), only 321 (8%) could be identified for the sample. This can be compared with 832 (20%) disclosures for the top 100 Australian companies in 2015 using the same method when modern slavery reporting was voluntary.[77] One-third of the top 100 companies made no disclosures in the 14 sub-themes. Of the 67 companies making at least one disclosure, 64 made qualitative disclosures, and 16 made quantitative disclosures (with only 13 companies making both).

A detailed breakdown of the results by theme and sub-theme is shown in Table 1. The most prominent themes represented are ‘Human rights in the supply chain’ and ‘Supplier code of conduct’. At the sub-theme level, disclosures about ‘Human rights’ and ‘Health and safety’ are the most prominent, followed equally by ‘Bribery and corruption’ and ‘Child labour’. Of note is that even though the overall level of disclosures is low, where made, forced and child labour together dominate disclosures on human rights issues (approximately 20%). Although these two areas are critical aspects of modern slavery,[78] the exploratory content analysis reveals a lack of focus on trafficking.

77. Christ et al., 2019
78. Crane, 2013

TABLE 2: Mean Disclosures and multinational and local company comparisons

Ms Sub-Themes	Annual Reports				Standalone Reports				Website Reports			
	Mean	Std Dev.	Var.	Kurtosis	Mean	Std Dev.	Var.	Kurtosis	Mean	Std Dev.	Var.	Kurtosis
Child Labour	0.14	0.35	0.12	2.49	0.09	0.29	0.08	2.91	0.10	0.30	0.09	2.71
Forced Labour	0.11	0.31	0.10	4.50	0.10	0.30	0.09	2.71	0.10	0.30	0.09	2.71
Trafficking	0.05	0.22	0.05	15.90	0.02	0.14	0.02	6.96	0.04	0.20	0.04	4.77
Minimum Wage	0.05	0.22	0.05	15.90	0.03	0.17	0.03	5.59	0.04	0.20	0.04	4.77
Human Rights	0.21	0.41	0.17	0.09	0.11	0.31	0.10	2.53	0.08	0.27	0.07	3.14
Health & safety	0.19	0.39	0.16	0.59	0.10	0.30	0.09	2.71	0.06	0.24	0.06	3.76
Abuse & Violence	0.04	0.20	0.04	21.14	0.02	0.14	0.02	6.96	0.05	0.22	0.05	4.19
Screening	0.07	0.26	0.07	9.91	0.05	0.22	0.05	4.19	0.02	0.14	0.02	6.96
Risk assessment	0.08	0.27	0.07	8.04	0.06	0.24	0.06	3.76	0.02	0.14	0.02	6.96
Diversity & Equal opp	0.03	0.17	0.03	29.90	0.01	0.10	0.01	10.00	0.04	0.20	0.04	4.77
Whistle Blowing	0.18	0.39	0.15	0.88	0.08	0.27	0.07	3.14	0.06	0.24	0.06	3.76
Bribery & Corruption	0.17	0.38	0.14	1.21	0.09	0.29	0.08	2.91	0.07	0.26	0.07	3.42
Code of conduct	0.12	0.33	0.11	3.71	0.08	0.27	0.07	3.14	0.09	0.29	0.08	2.91
General	0.07	0.26	0.07	9.91	0.05	0.22	0.05	4.19	0.04	0.20	0.04	4.77

Multinational vs local companies; sector analysis		
No. of subsidiaries	13	0.54(0.46)
Local companies	87	0.14(0.86)
Financial & consumer	67	0.18(0.82)
Oil & gas	8	0.13(0.87)
Industrial sector	12	0.25(0.75)

Note: Number = 100 companies; Std Dev. = Standard Deviation; Var. = Variance

Two additional considerations related to the influence of others on the disclosures of top listed Nigerian companies – the possible geographic impact of multinationals and industry sectors.

Although the largest Nigerian companies appear more likely to disclose modern slavery supply chain information, with 29 of the largest 30 listed companies making such disclosures, 13 of the top 100 are subsidiaries of multinational companies listed on the NSE (see Table 2). Of these, six (46%) produced no information about modern slavery. For the remaining 87 companies, 75 (86%) made no disclosures about forced or child labour. On this basis, although the results are poor across the board, the subsidiaries of multinationals have a slightly better disclosure record. In addition, overseas regulations on modern slavery risk disclosures do not yet have an impact on Nigerian practice. Whereas multinational companies account for 54% of the total modern slavery-related disclosures, the 87 local companies in Nigeria contribute only 14%.[79]

Sectors represented in the top 100 listed companies are dominated by financials (45), consumer goods and services (22), industrials (12), and oil and gas (8), with basic materials, healthcare, technology and telecom having minor representation. These sectors represent the total make-up of the NSE. While attention to the financial sector as a hot spot industry for modern slavery is only recent,[80] consumer goods and services and industrials are well recognised as potential risk sectors. Nonetheless, 82% of both the financials and the consumer goods and services sectors produced no information about modern slavery, and there is little difference in other sectors, with 75% of industrials making no modern slavery disclosures. Furthermore, sectoral analysis indicates that mean disclosure stands at 25% for industrial goods, followed by financial and consumer goods and services, which account for 18% of disclosures.

4.2 Analysis of Disclosure Themes

In addition to the descriptive statistics, disclosures relating to how the sample companies report on modern slavery risk in their supply chains were analysed thematically and in greater depth to reveal more detailed and potentially meaningful qualitative information. The main themes identified, following individual and cross-checked searches of the derived database, relate to education and awareness, supply chain codes of conduct, incidents reported, and collaboration.

4.2.1 Education and Awareness

Given the high risk of modern slavery in Nigeria, to end the practice, education and training to build awareness is critical for businesses, workers and the general public.[81] Although the level of modern slavery disclosures in the reports examined is only about 8% of the possible instances, this mirrors Okpala's[82] review of social disclosures in annual reports, including education and training. Given this result, it is promising that several companies will voluntarily disclose information about educational aspects of modern slavery from different sources.

Reference to education and training is generally confined to disclosures by the largest companies in the sample. For example, MTN Nigeria Communications, the second largest company, conducts virtual supplier training, which reached 453 participants in December 2020.[83] The company also seeks to ensure staff complete ethical compliance training and 'Ethically Aware Supplier Induction', although the total number of senior managers is not disclosed. They report:

> **Across the Group, a total of 5 990 (37%) permanent full-time employees have completed a compliance training course. Ethics officers from nine operating companies participated in the Ethically Aware Supplier Induction (EASI) training programme that was rolled out to senior managers of 180 small to medium-sized suppliers of our operating companies.**[84]

79. Spreadsheet data is available on request.
80. KPMG and the Australian Human Rights Commission 2021, Walk Free 2023
81. Nolan and Bott, 2018
82. Okpala, 2019
83. MTN Group Limited, 2020a, p. 36
84. MTN Group Limited, 2020b, p. 51

Zenith Bank has developed human rights assessment courses, namely 'Introduction to Human Rights Framework and the Rights of the Child', 'Understanding the Implications of Human Rights Non-compliance', and 'Human Rights in Business Transactions', to train staff across all levels on the basics of human rights. These courses have been deployed on their Learning Management Portal and made 'mandatory for staff, from entry-level to executive management level' (Zenith Bank, Annual Report, p. 79).

MTN Nigeria Communications is notable for including quantitative information, which makes it easier to understand and holds them accountable for their policies' overall success and reach. Sterling Bank, number 32 in size, likewise offers supplier training on sustainable procedures in the supply chain. However, the figures provided, of 30 vendors trained in 2019 and a further 13 to be trained in 2021, do leave the question of commitment to the process fairly open (Sterling Bank, Annual Report, p. 77). Without figures detailing the number of suppliers the company deals with, it is impossible to ascertain if this represents a dedicated effort to addressing the problem of supply chain-related labour abuses or if it is merely paying lip service. GlaxoSmithKline Nigeria also report their involvement with training as follows:

> **…we supported the delivery of human rights and modern slavery training sessions for suppliers in India and China. We also engaged with stakeholders in Brazil to better understand the forced labour risks and certification schemes associated with carnauba wax – used for tablet coatings – and presented our findings to suppliers (Sterling Bank Annual Report, p. 64).**

These vague statements do not include details that would allow the context of these trainings to facilitate open accountability. Although these disclosures do indicate that information about some aspects of modern slavery is being shared with some stakeholders, the vast majority of top companies do not indicate that they are involved with educating and training suppliers about modern slavery.

4.2.2 Supply Chain Codes of Conduct

A key theme identified in the modern slavery-related disclosures explored is the presence and enforcement by focal companies of supplier codes of conduct. These internally derived codes of conduct contractually affect upstream and downstream suppliers and purchasers. Where disclosures are made, supplier codes of conduct are cross-referenced in sustainability and annual reports, recognising the potential for integrated information on the economic and social aspects of modern slavery.

In its Sustainability Report (p. 22), Lafarge Africa holds supplier and third-party contractors responsible through the group Supplier Code of Conduct. Suppliers are expected to demonstrate some principles related to forced and child labour, bribery and corruption, and good working conditions. Likewise, in its code of conduct, the largest company, Dangote Cement, states that it will not contract with suppliers that engage in child or forced labour. Also, Airtel Africa states:

> **We are committed to combatting any form of slavery, trafficking, child labour, forced labour, inhuman treatment or working conditions that are a threat to life or hinder the physical, emotional and/or mental wellbeing of a person (Airtel Africa, Annual Report, p. 55).**

Similar codes are disclosed by Seplat Energy, the only company with its modern slavery statement, while Guinness Nigeria uses an online disclosure to stamp its mark against forced, child and bonded labour:

> Child labour and forced labour. As part of our commitment to broader human rights, we are committed to protecting the rights of children. We do not permit exploitation of children or involuntary servitude for our employees, or within our suppliers or business partners. This includes the consideration of debt bondage and unacceptable financial costs forced upon workers (Guiness Nigeria, Online statement, Human Rights Global Policy, p. 5)

Unilever Nigeria, in its Responsible Sourcing Policy, strictly refers to the non-acceptance of supplier use of child labour (workers under a specified age) and to forced and bonded labour:

> Under no circumstances will a supplier use forced labour, whether in the form of compulsory or trafficked labour, indentured labour, bonded labour or other forms. Mental and physical coercion, slavery and human trafficking are prohibited (Unilever Nigeria, Responsible Sourcing Policy, referred to in Annual Report, p. 50).

In contrast, several companies, such as Access Bank and Ecobank, have generic codes that apply to vendors and suppliers but do not specifically mention modern slavery-related themes. Zenith Bank states:

> As part of efforts to comply with the principles of responsible consumption and production, we have integrated environmental and social conditions into our Code of Conduct for Suppliers, Vendors and Contractors. The aim is to promote sustainable business practices, and to ensure high quality products and services, value for money and responsible sourcing of raw materials in our supply chain. Consequently, in 2020, we administered our "Code of Conduct" on all major vendors, suppliers and contractors of the bank and periodically screened all third-party business partners to ensure their compliance with E&S guidelines (Zenith Bank Annual Report, p. 80).

In Zenith Bank's disclosures, there is a voluntary focus on downstream and upstream modern slavery risks.

4.2.3 Incidents Reported

Concerning customers, Guaranty Trust Holding specifies:

> All 895 transactions booked were assessed for human rights risks such as child labour and forced labour. Assessment comprises of initial screening with the Exclusion Checklist for all customers and Further Due Diligence Assessment for High Risk customers. (Guaranty Trust Holding, Annual Report p. 94).

In contrast to the above, in line with Stringer and Mikhailova (2018) and Stevenson and Cole's (2018) thoughts, other companies take an opaque approach to the disclosure of information, which, while promising to consider these issues, makes it difficult for the reader to understand the level of and success associated with engagement. For example, Stanbic IBTC Holdings states:

> We are transparent in selecting, evaluating, and monitoring suppliers and the evaluations' criteria. This improves suppliers' and vendors' compliance with environmental and social standards and ensures that quality goods and services are delivered at all times. We strive to be transparent in selecting, evaluating, and monitoring suppliers to encourage healthy competition and inventiveness on their part while ensuring compliance with environmental and social standards (Stanbic IBTC Holdings, Sustainability Report, p. 27).

However, given claims of 'transparency' within the disclosures, it is unclear how they achieve compliance and improved standards.

Access Bank and Union Bank of Nigeria provide similar statements. In their sustainability report, the latter suggests that they 'recorded zero incidents of human rights violations' (Union Bank of Nigeria Sustainability Report, p. 23). Flour Mills of Nigeria likewise testifies to no reports of human rights breaches in their operations, although they also state, 'our operations are currently not subject to human rights reviews or human rights assessments…nor was there a breach of human rights reported or observed' (Union Bank of Nigeria Sustainability Report, p. 54). Nascon Allied Industries also observed that: 'In the year under review, we did not record any reported case of child labour, forced or compulsory labour. We will remain vigilant in our operations to ensure that this status is maintained' (Nascon Allied Industries Annual Report p. 59).

4.2.4 Collaboration

Collaboration and partnerships between stakeholders can be seen, first, as a way to combine knowledge individual focal companies have gained about supplier practices and, second, to economise on resources.[85] In the context of disclosures made, International Breweries draws attention to collaboration with different industry and business groups, including AIM-Progress, a company peer collaboration group, and SEDEX, a data platform for supply chain assessment. GlaxoSmithKline Nigeria also mentions the role of industry partnerships via membership of the Pharmaceutical Supply Chains Initiative's Human Rights and Labour Sub-Committee. FBN Holdings has strategic vendor partnership programmes as part of a Nigerian banking initiative, and to achieve this, it uses the Oracle E-Business Suite platform. Nascon Allied Industries records that the relative interest of NGOs and external affiliations in sustainability issues is low, as is their influence (Nascon Allied Industries Annual Report, p. 67).

These types of collaboration are consistent with the need for independent validation of modern slavery risk management processes highlighted by Christ and Burritt[86] and indicate that these few companies might represent better examples of practice. Nevertheless, collaboration with NGOs by the top listed companies in Nigeria is not the norm.

An alternative way of considering collaboration would not be disclosed as it involves collusion by default. Rogerson et al.[87] draw attention to herding in the UK university sector about modern slavery statements, where the universities respond similarly in a way that subverts the spirit of the legislation. In the Nigerian context, herding could be attributed to the non-disclosure of information about modern slavery in supply chains, where most listed companies in the top 100 undoubtedly have atrophied accountability. Additional research would be needed to confirm or disconfirm the possibility of herding.

The following section discusses these results in the context of RQ3. What actions might be needed to overcome or minimise the impact of the complex Nigerian setting when addressing modern slavery risk in business?

5. Discussion and the way forward

The previous sections highlight two findings about research questions 1 and 2. First, based on Crane's[88] contextual conditions, it is clear from general statistical data that Nigeria is associated with a complicated institutional context that has allowed modern slavery to continue into the 21st

85. Guthrie and Parker, 1990
86. Christ and Burritt, 2021
87. Rogerson et al., 2020
88. Crane, 2013

century. Without consideration of these conditions, any attempt to address modern slavery in Nigeria is likely to be ineffective. Section 4 sought to further understand and reveal the Nigerian situation by undertaking a granular content analysis of disclosures made by large Nigerian businesses. This analysis is needed to provide a benchmark of corporate action and evaluate if evidence of a trickle-down effect from modern slavery legislation in the West is seen. As the first study to consider modern slavery disclosure in the Nigerian and African contexts, this research contributes to the literature on accounting for modern slavery risk.[89] The results present a disappointing, although not unexpected, picture of Nigeria. However, a state of inaction is not inevitable.

In his seminal article, Crane[90] identifies several moderators that he argues may be effective in reducing the impact of the institutional contexts on the prevalence of modern slavery via changes in the exploiting and insulating capabilities and sustaining and shaping capabilities that organisations can use to fight modern slavery or maintain the status quo. These include supply chain interventions, which he argues can moderate the impact of industry context, the availability of affordable credit, which can moderate the poor socioeconomic conditions, and private and civil regulation, which can moderate the role of poor governance. The discussion now shifts to how these moderators may be harnessed in the Nigerian context to act as 'circuit-breakers' to begin addressing the challenge the country faces on the modern slavery front. The discussion then shifts to consider other interventions that may be more challenging but can help address the key factors that allowed slavery to flourish in the first place.

The themes from the content and thematic analysis revealed two main areas consistent with Crane[91] that could provide a first step to addressing modern slavery, which remains endemic in Nigeria. These involve supply chain codes of conduct and collaboration. It can be argued that each of these areas has the potential to fill the role of a supply chain intervention moderator. In his article, for example, Crane[92] draws on research from Balch[93] to show how large multinational companies like Kraft and Mars have played a role in improving conditions in the cocoa supply chain in West Africa by assisting growers. Nevertheless, while the disclosures present evidence of an internal domestic focus via supplier codes of conduct, how downstream requirements impact or assist Nigerian businesses remains unclear. Evidence of collaboration between select companies does exist.[94] However, where relevant, this suggests horizontal collaboration with peer organisations instead of vertical engagement with parent companies or large buyers downstream.

Although collaboration with peers, sometimes referred to as coopetition or cooperating with competitors, can provide a valuable way to learn from other organisations and benchmark current activities, Nigeria is starting from a low base. Thus, it can be argued that large supply chain partners and parent companies are likely to have more power to bring about meaningful change via supply chain interventions in the medium term. Given that Nigeria is home to subsidiaries of multinational companies like Nestle, Guinness and Unilever, it would be interesting to undertake case study research in one or more of these settings at both the parent and subsidiary levels to ascertain how requirements relating to modern slavery and

89. Christ et al., 2023
90. Crane, 2013
91. Ibid.
92. Ibid.
93. Cited in Ibid.
94. European Cocoa Association, 2019

decent work are being encouraged and supported within the subsidiary. This could include an analysis of internal reporting practices and assurance and audit, which might be expected given that the parents operate in jurisdictions where modern slavery reporting and due diligence have been mandated.

The second moderator Crane[95] identified as potentially being able to disrupt modern slavery is the availability of affordable credit. Nigeria has a well-established banking sector; many organisations analysed in this study are associated with the financial sector. However, interestingly, there is no evidence in the reports and disclosures analysed concerning the provisions of microfinance to vulnerable members of the community. Microfinance, or microcredit, can also be a tool to help vulnerable people trapped in informal employment break into more formal arrangements. It can also provide a way for entrepreneurs to legitimise business activities, which could help them build and eventually access larger markets that require a formal structure. Previous research has shown that microfinance can be very effective as a key instrument in helping people avoid falling into modern slavery and, in some cases, escaping slavery if they have already become victims, for example, via debt-bondage.[96] However, suppose microfinance is to be used as a 'circuit-breaker' to disrupt patterns of modern slavery in Nigeria. In that case, care must be taken to ensure appropriate regulation or partner organisations so that the solution does not become another manifestation of the problem it is trying to solve, as has been seen in Cambodia.[97] This suggests there may be a need for collaboration with both local and international NGOs such as the Red Cross, or other organisations such as the ILO. Research will be needed regarding how microfinance can best be set up and regulated in the Nigerian context, which will differ from how it might operate in other locations such as Southeast Asia. Studies considering different ways of accounting for microfinance arrangements would also be beneficial as accounting has excellent potential to make the process of microfinance transparent and guard against the manipulation of debt. The need for accountability in this space is crucial and additional, context-specific research is needed to assist in designing a suitable microfinance agenda for Nigeria where vulnerable people are protected.[98]

The final moderator mentioned by Crane[99] relates to the role of private or civil regulation. Crane argues that in the presence of weak governance, companies may choose to engage in private actions that form pseudo-regulation for organisations they deal with. This can occur within individual organisations and may involve NGO collaborations or constitute industry-wide initiatives. Where such initiatives exist, they will usually involve the collection of data and, in some cases, greater transparency, both of which necessitate a well-developed internal sustainability accounting system.[100] However, little is known about how such systems can be developed and what support is needed to help companies better understand their risks in a non-regulated environment. Crane[101] also highlights a potential role for both the media and NGOs in this space. However, little is known about the existence and success of such initiatives in the Nigerian context. As stated by Nascon Allied Industries in their Annual Report, interest from NGOs and external affiliations in sustainability issues in Nigeria remains low, and they currently have little influence. Given the social problems

95. Crane, 2013
96. Daru et al., 2005
97. Natarajan et al., 2021; also see Carswell et al. 2021 for a discussion regarding the pros and cons of microfinance.
98. Akanga, 2017
99. Crane, 2013
100. Christ et al., 2023
101. Crane, 2013

related to modern slavery that the country faces, the question remains why NGOs are not having the desired impact and effect. Research in this area would be beneficial, given that large NGOs, in particular, have an international platform and could shine a light on the challenges facing Nigeria while also lobbying for change, which could involve improved accountability within and across supply chains to mandatory reporting for large Nigerian companies.

While the potential moderators mentioned above provide a start for addressing slavery in the Nigerian context, it is also necessary to consider what Crane[102] refers to as slavery management capabilities that mediate the relationship between the institutional or environmental context and the eventual prevalence of modern slavery. These include exploiting and insulating capabilities and sustaining and shaping capabilities.

Violence and the threat of violence are core to the exploitation of modern slavery by businesses, but they are at the end of a conveyor belt of violence that starts with poor attitudes and is enforced by traditions that remove the opportunity to be independent and walk away. Nestle Nigeria is one of the few companies that specifically recognise this continuum in its supplier code of conduct by requiring that suppliers 'Not make use of violence, threats of violence, punishment, confinement, or any methods of intimidation to discipline or control workers that contradicts their human rights'. Along with Seplat Energy, which espouses a similar provision in its code of conduct, it appears to be building reputational capital in the labour market, where illegality has been a contextual norm. Circuit breaker research into potential gaps between such de jure reputational tools and de facto practices is sorely needed in the Nigerian setting.

Concern over abuse of debt barely receives a mention by the top 100 companies. While microfinance can provide a form of good debt that, in a controlled setting, can reduce modern slavery and alleviate poverty, debt can also be manipulated in ways that exacerbate risk. In their global employment rights of workers, Guinness Nigeria does not accept debt bondage and unacceptable financial costs being forced upon workers. Is this declarative circuit breaker sufficient to stop the practice? Case studies of success and failure would be most instructive. Such research is needed into the pressures that socioeconomic and cultural considerations bring on the different parties, the focal company and its suppliers, the workers, and whether this is pushed underground through tools such as accounting opacity in supply chains.

Accounting, as an internal tool of management, can be used as a mediator to exploit the contexts supporting slavery and insulate the organisation from those wishing to end the practice.[103] For example, management accounting can be used in opaque financial ways to facilitate debt management, such as the charging of extortionate interest rates or accommodation costs, overstating monies due to employers by employees in debt bondage and holding workers in perpetual forced labour.[104] They may also use threats of violence to workers and their families in order to quash any suggestions of the need for transparency. Such accounting opacity is not easily overcome, as managers control the internal computations and workers have no contracts specifying these matters because of the large informal economy. In short, because of accounting opacity, neither workers nor downstream purchasers can scrutinise the calculations behind labour and product transactions, thereby allowing modern slavery practices to persist. Furthermore, in a largely

102. Crane, 2013
103. Ibid.
104. Christ et. al, 2023; Gold et al., 2015

informal economy, with micro and small businesses dominating, there is often no internal accounting system in place, and opacity is definitional.

Overcoming such opacity could be encouraged by introducing and enforcing formal contracts that include codes of conduct – a conversion from informal to formal activities in the economy. Nevertheless, achieving such an outcome is fraught with the difficulties associated with socioeconomic circumstances and the need to change existing gender inequalities, religious beliefs and traditions. Unilever Nigeria states, 'A key element of our ethical approach to business is to reduce inequality and promote fairness', and a handful of other companies specifically support equality (5) and no religious discrimination or discrimination based on tradition, such as tribal issues (6). Nevertheless, research is needed into whether modern slavery exists through a process of contextual osmosis.

Likewise, internal accounting can be used by managers controlling workers to sustain the supportive contexts and shape these over time.[105] A cynic could argue that some businesses seek the sustainability of modern slavery as a business practice and that accounting could help perpetuate this process. The challenge is to wed internal accounting mechanisms to market contracts and supplier codes of conduct as combined aspects of transparent, sustainable employment and sustainable procurement practices. For example, FBN Holdings, looking for sustainable banking practices in its annual and sustainability reports, repeats that it is 'Working on producing a supply-chain management code designed for minimum supplier compliance with sustainability practices', but this is at a level of information which does not address the issue of how this might be operationalised or measured. In contrast, TotalEnergies Marketing Nigeria commit to instituting and sustaining decent working conditions at their sites and high-risk suppliers, prohibiting forced labour and child labour, a commitment to freedom of association and non-discrimination.

Crane (2013) suggests labour supply chain management as a mediator that facilitates the exploitation and insulation of illegal practices. Where employees can be isolated geographically or through efficient and effective criminal trafficking networks, they become more vulnerable to stepping onto the conveyor belt, leading to modern slavery. While the top 100 do discuss supply chain networks and supplier codes of conduct positively, there is also a focus on value chains, and this could be a circuit breaker as it directly focuses on the financial rationale for modern slavery in business – lowering costs of labour.

Possible mediating variables of moral legitimisation and domain maintenance are introduced by Crane[106] as sustaining and shaping the operating capabilities of a business practicing modern slavery. Breaking the perceived moral legitimacy of modern slavery practice in Nigeria could be commenced through specific modern slavery risk disclosure legislation, compliance with which would be designed to facilitate enhanced reputations. However, the likelihood is that organisations with such criminal intent would continue unless the perceived and actual value were affected. Traditions and religious mores undoubtedly continue to socialise people into modern slavery, especially about gender-based modern slavery. It is here that education and awareness programs at all levels can act as crucial circuit breakers – for example, to reduce bribery and corruption and to recognise the interdependence between impacts on the vulnerable and the quality of life of the more favoured.

105. Crane, 2013
106. Ibid.

6. Conclusion

Although the UN has committed to ending all forms of modern slavery by 2025, the problem remains endemic, especially in developing countries like Nigeria. Several Western governments have committed to the use of accounting and transparency as a way to combat this problem by encouraging large companies to collect and analyse data on risks and take action to address these not only in their operations but in their supply chains. The optimistic view is that such legislation will trickle down and improve conditions at the beginning of supply chains in countries like Nigeria. The aim is to stop modern slavery in business from happening at its roots. The analysis presented here demonstrates that achieving such lofty ambitions is difficult. Nigeria is faced with a challenging institutional context that has allowed slavery to continue almost unabated into the 21st century. Although there is a role for large MNEs[107] operating in Nigeria to take meaningful action to begin addressing the problem, they need to do so with a ground-up understanding of why the issue continues. Attempting to retrofit solutions that work in North America, Europe or Australia, for example, is unlikely to provide the desired results in a country like Nigeria. More work is needed to understand whether such tools are appropriate or new; context-specific tools must be developed. In particular, the different contexts embedded in Nigeria over lengthy periods mean that change will not be quick and needs a strategy to change the system in the long term.

The analysis here represents a first attempt at applying the seminal work of Crane[108] in a developing country context to understand better the institutional conditions that need to be considered when designing appropriate interventions for addressing modern slavery. Hopefully, this study will encourage other researchers to use Crane's[109] framework in similarly challenging settings. While this study has allowed a much more in-depth understanding of the Nigerian context than was previously available, it is also not without limitations. As with previous studies on modern slavery risk management and accounting, this study used disclosures to establish the status quo about large businesses operating in Nigeria. Although it could be argued that the lack of disclosures observed was expected, it is also necessary to establish this to provide a benchmark for future dialogue and research on the issue. Future studies can use these results to provide an entrée into interview-based studies with business and government representatives, as well as NGOs, to ascertain their perspectives regarding Nigeria's current situation and how best to address the problem. It must also be remembered that disclosures do not necessarily represent actions. Instead, they represent only what the disclosing organisation wants readers to know. It is possible that select larger organisations with Western affiliations are doing more work in this area, but this is not being openly acknowledged. Case studies or interview-based research would be beneficial in this regard. In particular, an essential contribution to the literature on sustainability accounting would be a more detailed overview of the internal sustainability accounting systems and management controls that can be used to help manage expectations. If they are being used, how were they developed, and how successful have they been? If they are not being used, what types of information do businesses need access to, and how can sustainability management accounting systems be developed to help capture this information? These questions for future research should be developed

107. Ibid.
108. Crane, 2013
109. Ibid.

with reference to specific contextual settings to ensure recommendations are fit for purpose.

There has been much interest in recent years given to addressing the wicked problem of modern slavery. Policy and research in this regard have primarily focused on Western countries and adopted a Western country perspective concerned with disclosure and increased transparency, which it is argued will bring about top-down improvement and a trickle-down effect to locations where the issue is not assigned equal importance. While not seeking to disparage these initiatives, developing countries like Nigeria are not little Western countries. They face a complicated institutional context, and it is only when this context is understood from the ground up that progress might be made to finding solutions with the potential to make a difference in people's lives, both now and in the future. Furthermore, the need is for Nigerian governments, non-government and businesses to be committed to and to institute an independent approach to ending modern slavery practices. That should be their choice. Who will be the person in Nigeria committed to stopping modern slavery at its contextual sources? They have yet to emerge.

Supplementary material

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