

STRT

SUPPLIER USER GUIDE

THE INDUSTRY STANDARD TEMPLATE



Table of Contents

INTRODUCTION	5
HOW IT WORKS	5
WHY AM I BEING ASKED TO COMPLETE THE STRT?	5
FILLING OUT THE STRT — A STEP-BY-STEP GUIDE	6
Introduction	6
Declaration	6
Company Information	6
Questions	7
Screening & Prioritization	8
Question 1: Does your company operate in any of the countries listed on the Countries tab? If yes, please select all the countries that apply on the Countries tab.	8
Question 2: Do your suppliers operate in any of the countries listed on the Countries tab?	8
Question 3: Does your company, or do your suppliers, work in any of the industries listed on the Industries tab?	8
Question 4: Does your company employ low-skilled foreign or domestic migrant workers (directly or through recruiters)?	8
Question 5: If you answered Yes to Question 4, does your company use recruiters to recruit low-skilled foreign or domestic migrant workers?	9
Policy	
Question 6: Does your company issue and enforce a policy/policies prohibiting employees and agents from the following:	9
Question 7: Does your company issue and enforce a policy/policies explicitly ensuring the following:	10
Supply Chain Management	
Question 8: Are your suppliers required to accept and comply with your policies listed in Questions 6 and 7?	12

Risk Identification & Management

Question 9: Does your company perform formal screening and evaluation of prospective recruiters to determine if they (i) operate in compliance with the law and applicable company policies, and (ii) observe the “employee pay” principle of not charging any recruitment fees to workers, as defined in the Glossary? 12

Question 10: Does your company engage in verification activities to identify, assess, and manage risks specific to slavery and human trafficking in its operations and supply chains? 12

Question 11: If you answered ‘Yes’ to Question 10, does your company use an independent third party to conduct these verification activities? 13

Training

Question 12: Do your employees who have direct responsibility for supply chain management and recruitment receive training on how to mitigate risk of slavery and human trafficking? 13

Reporting & Internal Accountability

Question 13: Does your company have a process for employees and agents to report, without fear of retaliation, matters related to slavery and human trafficking? 13

Question 14: Does your company maintain internal accountability standards and procedures for employees and agents who fail to meet company standards regarding slavery and human trafficking? 13

Certification

Question 15: Does your company require direct (first tier) suppliers to certify that materials incorporated into their products comply with all slavery and human trafficking laws of the country or countries in which they are doing business? 14

Public Disclosure

Question 16a: Is your company required to publicly disclose information on its efforts to address human trafficking and slavery? This includes, but is not limited to, the UK Modern Slavery Act and the California Transparency in Supply Chains Act 14

Question 16b: If you answered ‘Yes’ to Question 16a, is your company in compliance with the relevant legislation? 14

Compliance Plan Requirements (FAR Compliance)

Question 17: Is your company engaged in US federal contracts, as a contractor or a subcontractor, whereby the contract or portion of the contract (i) has an estimated value above \$500,000, and (ii) is for the provision of supplies acquired, or services performed, outside of the US, excluding commercially available off-the-shelf items? 14

Question 18: If you answered ‘Yes’ to Question 17, do you have a compliance plan that meets the minimum requirements outlined in the US FAR final rule on Combating Trafficking in Persons? 15

Question 19: If you answered ‘Yes’ to Question 17, has your company posted the relevant contents of its compliance plan at the workplace and on its website, or, if posting at the workplace or on its website is impractical, has your company provided it to each worker in writing? 15

Question 20: If you answered ‘Yes’ to Question 18, does your company annually submit a certification to the US Federal Government Contracting Officer or prime contractor showing (i) it has implemented its compliance plan; and (ii) after conducting due diligence, either – (a) to the best of your company’s knowledge and belief, neither it nor any of its agents, subcontractors, or their agents is engaged in any such activities; or (b) if abuses have been found, your company or subcontractor has taken the appropriate remedial and referral actions. 15

Certification: Do you certify that all the answers provided in this document are true and accurate to the best of your knowledge and understanding, and commit to providing evidence to support all of your answers if and as required by your customer?16

COUNTRIES 16

INDUSTRIES..... 16

REVIEW 16

GLOSSARY 16

ABOUT US 16

Introduction

The Slavery & Trafficking Risk Template (STRT) is a standardized open-source template you can use to **share slavery and human trafficking-related risk and compliance data** with your customers.

The STRT empowers you to disclose information to your customers that will assist them in their efforts to strengthen their compliance programs in the fight against human trafficking and slavery. Once you've shared this information with your customers, they can then prioritize and implement risk mitigation actions with the goal of fortifying their organization as well as yours against illegal and unethical practices.

How It Works

The STRT is an interactive document. Each question is structured to gain specific information related to human trafficking, slavery, and compliance risk. The template records the answer to each question, then runs logic algorithms to check the data's accuracy and validity.

Once the template is completed with valid information, you should submit it, along with any supporting documentation, to your customers upon their request. The data gathered helps your customers to implement human trafficking-related risk mitigation actions.

Why Am I Being Asked to Complete the STRT?

You have been asked to complete the STRT because one or more of your customers is collecting data from their supply chain on high-level indicators of human trafficking as well as indicators of compliance with human trafficking and slavery legislation. You may be completing the STRT as part of your own internal efforts to gauge your organization's risk level as it relates to human trafficking and slavery.

If your customer, or customers, have requested that you submit the STRT, this does **not** mean that you are suspected of using trafficked and forced labour. It simply means that your customer, or your customers, is seeking to better understand risk in their supply chain for the purpose of mitigating or preventing this risk.

Filling Out the STRT— A Step-by-Step Guide

The STRT is separated into six sections, or tabs. These tabs are:

- Introduction
- Declaration
- Countries
- Industries
- Review
- Glossary

Each tab will be explained within this document, along with instructions on how to use each section.

Introduction

When users first open the STRT, they will begin on the **Introduction** tab. This section includes information vital to complete the template accurately. It includes an introduction to the STRT, an explanation of how the STRT works and an overview of each of the tabs.

Refer to this tab at any time for clarification on the purpose of the STRT or any tabs it contains.

Declaration

The **Declaration** tab represents the bulk of the STRT. In this section, you will respond to a series of questions designed to assess risks of slavery and human trafficking and non-compliance with human trafficking and slavery regulations.

The **Declaration** tab is separated into several categories. Each category contains questions pertaining to specific slavery and human trafficking-related topics.

The STRT is now available in English, French, Spanish, German, Chinese, Japanese and Portuguese. You can select your preferred language from the drop-down box at the top of the **Declaration** tab. Once a language is selected, the STRT will automatically translate.

VERSION

This section identifies the STRT version. You should always use the most recent version of the STRT, as listed on the www.sraglobal.org website. This field is auto-populated by the STRT and is for reference and version control only.

COMPANY INFORMATION

Company Name

Input the name of the organization **completing and submitting** the STRT. Do not use abbreviations.

Company Unique Identifier Number or Code

Input the DUNS number, VAT number, customer-specific identifier, or another number or code unique to your company.

Data Universal Number System (DUNS) number: A unique numeric identifier, issued by Dun & Bradstreet, that is assigned to your business to establish a business credit file. **Note:** a DUNS number is not required to successfully complete this section of the STRT.

Value Added Tax (VAT) identification number: A unique identifier used for value added tax purposes in certain countries. **Note:** a VAT number is not required to successfully complete this section of the STRT.

Company Address

Input your company's mailing address. If your company operates in more than one location, input the head office's information.

Contact Person's Full Name

List the full name of the primary contact person for any communications in regards to the information provided within the STRT.

Contact Email

List the contact person's email.

Contact Phone Number

List the contact person's phone number.

Authorizing Person's Full Name

List the full name of the person authorized to declare the contents of this survey as true and accurate to the best of his/her knowledge. The authorizing person may be different than the contact person.

Authorizing Person's Title

Enter the authorizing person's title within the organization.

Authorizing Person's Email

List the authorizing person's email.

Authorizing Person's Phone Number

List the authorizing person's phone number.

Date of Completion

Enter the date upon which the survey was completed. Dates should be formatted YYYY/MM/DD.

Required Fields

All fields in yellow require a response, and **must** be completed in order to submit a valid STRT, unless otherwise noted. Grey fields do not require a response.

Guidance/Definition/Description

An asterisk (*) indicates there is guidance, a definition or description located in the **Glossary** tab which will help to answer the question. Users should ensure they review this information prior to completing the question in order to understand the requirements.

Questions

Each of the questions on the **Declaration** tab has several columns. These columns are used to collect responses to the questions as well as supporting documentation,

if applicable. An explanation of each of these columns is provided below. Note that supporting documentation columns may change from grey (not required) to yellow (required) fields depending on the answer provided in the **Response** column.

Question

This column on the **Declaration** tab indicates the question number and is used to quickly reference specific questions within the STRT. This is for reference only and requires no input from you.

Sub-Question

In cases where a question has several parts, this column on the **Declaration** tab indicates the corresponding sub-question number. It is used to quickly reference specific sub-questions within the STRT. This is for reference only and requires no input from you.

Question

This column on the **Declaration** tab lists the question that requires a response.

Response

Enter your response to the corresponding question in the **Response** column on the **Declaration** tab. Each question requires a 'Yes' or 'No' answer, unless another option is available in the dropdown list. You can use the drop-down arrow in the bottom right corner of the response field to select your answer, or type in 'Yes' or 'No'. Only 'Yes' or 'No' are acceptable responses, unless otherwise specified. Any other response will result in an error message.

Supporting Documentation Required

The **Supporting Documentation Required** column on the **Declaration** tab identifies if you are required to submit documentation supporting your answer to the question. The column will automatically change from grey to white, and red text will indicate the specific type of documentation required. If the column remains grey after the response has been inputted, the field is not required.

URL or File

When supporting documentation is required, you are required to identify within the **URL or File** column of the **Declaration** tab whether you will include a web link to the document, or if a digital file will be submitted to the company requesting the STRT. The link or digital file name should be included directly into the STRT in the appropriate field.

Insert URL to Relevant...

If you are required to submit supporting documentation, you should include the link or file name in the appropriate field within the **Insert URL to relevant document(s) or corresponding file name(s)** column of the **Declaration** tab. Ensure links are valid before submitting the STRT.

SCREENING & PRIORITIZATION

Question 1: Does your company operate in any of the countries listed on the Countries tab? If yes, please select all the countries that apply on the Countries tab.

This question requires users to identify if their company operates within any of the countries listed in the **Countries** tab. To respond to this question, first refer to the list of countries found in the Countries tab. If your company operates in any of these countries, select (or type) 'Yes' in the **Response** field of the appropriate question in the **Declaration** tab. Then, on the **Countries** tab, mark a 'Yes' next to any country within which your company operates.

If your company does not operate in any of these countries, select (or type) 'No' in the **Response** field.

The countries listed on the **Countries** tab are Tier 2, Tier 2 Watchlist, Tier 3, and Special Cases according to the US Department of State's 2017 Trafficking in Persons Report (updated annually).

Question 2: Do your suppliers operate in any of the countries listed on the Countries tab?

Prior to answering this question, refer to the **Glossary** tab for the definition of 'supplier'.

This question does NOT require you to select the countries on the **Countries** tab within which your suppliers operate. To answer this question, refer to the list of countries on the **Countries** tab, and if you have suppliers operating in any of these countries, then select (or type) 'Yes' in the corresponding **Response** field on the **Declaration** tab. If you do not have suppliers operating in any of the countries on the **Countries** tab, then answer this question by selecting or typing 'No' in the response field.

Question 3: Does your company, or do your suppliers, work in any of the industries listed on the Industries tab?

Prior to answering this question, refer to the **Glossary** tab for the definition of 'supplier'.

This question requires you to identify if your company and/or your suppliers work in any of the industries listed on the **Industries** tab. To answer this question, refer to the list of industries on the Industries tab. If your company or your suppliers operate within any of these industries, select (or type) 'Yes' in the corresponding **Response** field on the **Declaration** tab. On the **Industries** tab, mark an 'X' next to any industry within which you or your suppliers operate.

If you or your suppliers do not operate within any of the listed industries, select (or type) 'No' in the corresponding **Response** field on the **Declaration** tab.

Question 4: Does your company employ low-skilled foreign or domestic migrant workers (directly or through recruiters)?

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'low-skilled', 'migrant workers', and 'recruiters'.

Select or type the answer 'Yes' if your company employs low-skilled foreign or domestic migrant workers, and 'No' if your company does not in the **Response** field.

Question 5: If you answered yes to Question 4, does your company use recruiters to recruit low-skilled foreign or domestic migrant workers?

Prior to answering this question, refer to the **Glossary** tab for the definitions of ‘low-skilled’, ‘migrant workers’, and ‘recruiters’.

If you answered ‘Yes’ to Question 4 and your company uses recruiters to recruit low-skilled foreign or domestic migrant workers, the answer to this question is ‘Yes’.

If you answered ‘Yes’ to Question 4 and your company does NOT use recruiters to recruit low-skilled foreign or domestic migrant workers, the answer to this question is ‘No’.

Note if you answered ‘No’ to Question 4, you are not required to provide an answer to Question 5.

POLICY

Question 6: Does your company issue and enforce a policy/policies prohibiting employees and agents from the following:

Prior to answering this question, refer to the **Glossary** tab for the definitions of ‘policy/policies’ and ‘agent’.

- a) engaging in all forms of forced labour and human trafficking?

Prior to answering this sub-question, refer to the **Glossary** tab for the definitions of ‘human trafficking’ and ‘forced labour’.

If your company issues and enforces a policy/policies prohibiting employees and agents from engaging in all forms of human trafficking and forced labour, select or type ‘Yes’ in the **Response** field. If not, select or type ‘No’.

If ‘Yes’ the **Supporting Documentation Required** column will indicate ‘Policy Required’ in red. Choose the ‘URL’ or ‘File’ option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- b) engaging in child labour?

Prior to answer this sub-question, refer to the **Glossary** tab for the definition of ‘child labour’.

If your company issues and enforces a policy/policies prohibiting employees and agents from engaging in all forms of child labour, select or type ‘Yes’ in the **Response** field. If not, select or type ‘No’.

If ‘Yes’ the **Supporting Documentation Required** column will indicate ‘Policy Required’ in red. Choose the ‘URL’ or ‘File’ option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- c) withholding employee identity or immigration documents?

Prior to answering this sub-question, refer to the **Glossary** tab for the definition of ‘withholding employee identity or immigration documents’.

If your company has a policy in place prohibiting employees and agents from withholding employee identity or immigration documents, select or type ‘Yes’ into the **Response** field. If not, select or type ‘No’.

If ‘Yes’ the **Supporting Documentation Required** column will indicate ‘Policy Required’ in red. Choose the ‘URL’ or ‘File’ option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- d) using recruiters that do not comply with local labour laws of the country in which the recruiting takes place?

Prior to answering this sub-question, refer to the **Glossary** tab for the definition of ‘recruiter’.

If your company has a policy in place prohibiting the use of recruiters that do not comply with the local labour laws

of the country in which the recruiting takes place, select or type the 'Yes' option in the **Response** field. If not, select or type 'No'. If your company does not use recruiters, select the 'N/A' option from the dropdown list.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- e) charging employees recruitment fees, according to the definition provided in the **Glossary**?

Prior to answering this sub-question, refer to the **Glossary** tab for the definition of 'recruitment fees'.

If your company issues and enforces a policy/policies prohibiting employees and agents from charging employees recruitment fees, according to the definition provided in the **Glossary** tab, answer this question by selecting or typing 'Yes' in the **Response** field. If not, select or type the answer 'No'.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- f) procuring commercial sex acts during the length of the contract?

Prior to answering this sub-question, refer to the **Glossary** tab for the definition of 'commercial sex act'.

If your company issues and enforces a policy/policies prohibiting the procurement of commercial sex acts during the length of the contract, select or type the option 'Yes'. If not, select or type the option 'No'.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL'

or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 7: Does your company issue and enforce a policy/policies ensuring the following:

- a) the provision or payment of return transportation for all foreign migrant workers at the end of their period of employment if they were brought to the country for the purpose of working for your company (directly or through recruiters) unless they fall under the exceptions outlined in the **Glossary** under 'Return Transportation'?

Prior to answering this sub-question, refer to the definitions of 'migrant worker', 'recruiter', and 'return transportation' in the **Glossary** tab.

If your company issues and enforces a policy/policies ensuring the provision or payment of return transportation for all foreign migrant workers at the end of their period of employment, if they were brought to the country for the purpose of working for your company, answer the question 'Yes'. If your company has no such policy, or the worker(s) fall under the exceptions outlined in the **Glossary** under 'return transportation', answer the question 'No'. If your company does not hire foreign migrant workers, select the 'N/A' option from the dropdown list.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- b) housing provided or arranged for your employees meets host-country housing and safety standards?

Prior to answering this sub-question, refer to the definition of 'housing provided or arranged' in the **Glossary** tab.

If your company issues and enforces a policy/policies ensuring the housing provided or arranged for your employees meets host-country housing and safety standards, answer this question 'Yes'. If you do not have such policies in place, answer this question 'No'. If your company does not provide or arrange housing, select the 'N/A' option from the dropdown list.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- c) migrant workers can cancel their employment contracts with no financial penalty before they relocate for work?

Prior to answering this sub-question, refer to the definition of 'migrant worker' in the **Glossary** tab.

If your company has a policy/policies in place ensuring migrant workers can cancel their employment contracts with no financial penalty before they relocate for work, answer this question 'Yes'. If not, answer this question 'No'. If your company does not hire foreign or domestic migrant workers, select the 'N/A' option from the dropdown list.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- d) wages meet applicable host country legal requirements or, if there is no legal minimum wage, wages are aligned with the prevailing industry wage?

If your company has a policy/policies in place to ensure employee wages meet applicable host country legal requirements or, if there is no legal minimum wage, wages are aligned with the prevailing industry wage, answer this question 'Yes'. If your company has no such policy in place, answer this question 'No'.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- e) all employees, including those hired by recruiters, are provided with detailed and accurate employment agreements or similar work papers, prior to relocation in cases where the employee must relocate to perform work, and in a language understood by the employee?

Prior to answering this sub-question, refer to the **Glossary** tab for the definitions of 'employment agreement or similar work papers' and 'recruiter'.

If your company has a policy/policies in place ensuring all employees, including those hired by recruiters, are provided with detailed and accurate employment agreements or similar work papers, prior to relocation in cases where the employee must relocate to perform work, and in a language understood by the employee, answer 'Yes, and this applies to all employees whether required by law or by contract', or 'Yes, but only when required by law or by contract'. If your company does not have such a policy in place, answer 'No' to this question.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

- f) document checks (including proof of age documents) of all employees before they begin working to confirm they are allowed to work according to legal standards and applicable company policies?

If your company has a policy/policies in place to ensure document checks (including proof of age documents) of all employees before they begin working to confirm they are allowed to work according to legal standards and applicable company policies, answer this question 'Yes'. If your company has no such policy in place, answer this question 'No'.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

SUPPLY CHAIN MANAGEMENT

Question 8: Are your suppliers required to accept and comply with your policies listed in Questions 6 and 7?

Prior to answering this question, refer to the **Glossary** tab for the definition of 'supplier'.

If your suppliers are required to comply with your policies listed in Questions 6 and 7, answer this question 'Yes'. If your suppliers are not required to comply, answer this question 'No'. If your company does not work with suppliers, select the 'N/A' option from the dropdown list.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

RISK IDENTIFICATION & MANAGEMENT

Question 9: Does your company perform formal screening and evaluation of prospective recruiters to determine if they (i) operate in compliance with the law and applicable company policies, and (ii) observe the "employee pay" principle of not charging any recruitment fees to workers, as defined in the Glossary?

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'recruiters' and 'recruitment fees'.

If your company does perform formal screening and evaluation of prospective recruiters to determine if they (i) operate in compliance with the law and applicable company policies, and (ii) observe the "employee pay" principle of not charging any recruitment fees to workers, as defined in the **Glossary**, answer this question with 'Yes'. If your company does not perform such formal screening of prospective recruiters, select or type 'No'.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 10: Does your company engage in verification activities to identify, assess, and manage risks specific to slavery and human trafficking in its operations and supply chains?

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'human trafficking', 'slavery', and 'supply chain' to answer this question.

If your company engages in verification activities to identify, assess, and manage risks specific to slavery and human trafficking in its operations and supply chains, answer this question 'Yes'. If not, answer this question 'No'. If your company does not work with suppliers, select the 'N/A' option from the dropdown list.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 11: *If you answered 'Yes' to Question 10, does your company use an independent third party to conduct these verification activities?*

If you answered 'Yes' to Question 10 and your company uses an independent third party to conduct the verification activities mentioned in Question 10, answer 'Yes' to this question. If you answered 'Yes' to Question 10 but your company does not use an independent third party to conduct said verification activities, the answer to this question is 'No'.

Note: If you answered Question 10 with 'No' or 'N/A', you are not required to provide an answer to Question 11.

TRAINING

Question 12: *Do your employees who have direct responsibility for supply chain management and recruitment receive training on how to mitigate risk of slavery and human trafficking?*

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'human trafficking', 'slavery', 'training' and 'supply chain' to answer this question.

If your company provides training on how to mitigate risks of human trafficking and forced labor to employees who have direct responsibility for supply chain management, answer this question 'Yes'. If not, answer this question 'No'.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the

Insert URL to relevant document(s) or corresponding file name(s) field of the **Declaration** tab.

REPORTING & INTERNAL ACCOUNTABILITY

Question 13: *Does your company have a process for employees and agents to report, without fear of retaliation, matters related to slavery and human trafficking?*

Refer to the **Glossary** tab for the definitions of 'agent', 'human trafficking', and 'slavery' to answer this question.

If your company has a process in place for employees and agents to report, without fear of retaliation, matters related to slavery and human trafficking, answer this question 'Yes'. If not, answer the question by typing or selecting 'No'.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 14: *Does your company maintain internal accountability standards and procedures for employees and agents who fail to meet company standards regarding slavery and human trafficking?*

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'agent', 'human trafficking', 'slavery', and 'internal accountability standards'.

If your company maintains internal accountability standards and procedures for employees and agents who fail to meet company standards regarding slavery and human trafficking, answer this question 'Yes'. If your company does not maintain these standards and procedures, select or type 'No'.

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File**

field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

CERTIFICATION

Question 15: *Does your company require direct (first tier) suppliers to certify that materials incorporated into their products comply with all slavery and human trafficking laws of the country or countries in which they are doing business?*

Prior to answering this question, refer to the **Glossary** tab for the definitions of ‘direct or first tier suppliers’, ‘human trafficking’, and ‘slavery’.

If your company requires direct (first tier) suppliers to certify that materials incorporated into their products comply with all slavery and human trafficking laws of the country or countries in which they are doing business, answer this question by selecting or typing ‘Yes’. If your company does not set this requirement, the answer to this question is ‘No’. If your company does not work with suppliers, select the ‘N/A’ option from the dropdown list.

If ‘Yes’ the **Supporting Documentation Required** column will indicate ‘Policy Required’ in red. Choose the ‘URL’ or ‘File’ option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

PUBLIC DISCLOSURE

Question 16a: *Is your company required to publicly disclose information on its efforts to address human trafficking and slavery? This includes, but is not limited to, the UK Modern Slavery Act and the California Transparency in Supply Chains Act.*

Prior to answering this question, refer to the **Glossary** tab for the definitions of ‘human trafficking’, ‘The California Transparency in Supply Chains Act’, and ‘The UK Modern Slavery Act’.

If your company is required to publicly disclose information on its efforts to address human trafficking and modern slavery as per the requirements outlined in this question, select or type ‘Yes’ in the Response field. If not, select or type ‘No’.

Question 16b: *If you answered ‘Yes’ to Question 16a, is your company in compliance with the relevant legislation?*

If ‘Yes’ the **Supporting Documentation Required** column will indicate ‘Proof of public disclosure required’ in red. Choose the ‘URL’ or ‘File’ option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

COMPLIANCE PLAN REQUIREMENTS (US FEDERAL ACQUISITION REGULATION FINAL RULE ON COMBATING TRAFFICKING IN PERSONS)

Question 17: *Is your company engaged in US federal contracts, as a contractor or a subcontractor, whereby the contract or portion of the contract (i) has an estimated value above \$500,000, and (ii) is for the provision of supplies acquired, or services performed, outside of the US, excluding commercially available off-the-shelf items?*

Prior to answering this question, refer to the **Glossary** tab to define ‘commercially available off-the-shelf item’.

If your company is engaged in US federal contracts as a contractor or subcontractor and falls under the requirements outlined in Question 17, select or type ‘Yes’ into the **Response** field. If your company is not engaged in US federal contracts, as a contractor or subcontractor, under the requirements outlined in Question 17, answer the question ‘No’.

Question 18: *If you answered ‘Yes’ to Question 17, do you have a compliance plan that meets the minimum requirements outlined in the US FAR final rule on Combating Trafficking in Persons?*

If you answered ‘Yes’ to Question 17 and you have a compliance plan that meets the minimum requirements outlined in the US FAR final rule on Combating Trafficking in Persons, answer Question 18 ‘Yes’. If you do not have a compliance plan that meets the minimum requirements outlined in the US FAR final rule on Combating Trafficking in Persons, answer this question ‘No’.

If ‘Yes’ the **Supporting Documentation Required** tab will indicate ‘Policy Required’ in red. Choose the ‘URL’ or ‘File’ option from the drop down in the **URL or File** column. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** column of the **Declaration** tab.

Note: If you answered ‘No’ to Question 17 you are not required to answer Question 18.

Question 19: *If you answered ‘Yes’ to Question 17, has your company posted the relevant contents of its compliance plan at the workplace and on its website, or, if posting at the workplace or on its website is impractical, has your company provided it to each worker in writing?*

If your answer to Question 18 is ‘Yes’ and your company has posted the relevant contents of its compliance plan at the workplace and on its website or provided it to each worker in writing, the answer to this question is ‘Yes’.

If your answer to Question 18 is ‘Yes’ and your company has **not** posted the relevant contents of its compliance plan at the workplace and on its website or provided it to each worker in writing, the answer to this question is ‘No’.

If ‘Yes’ the **Supporting Documentation Required** tab will indicate ‘Policy Required’ in red. Choose the ‘URL’ or

‘File’ option from the drop down in the **URL or File** column. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** column of the **Declaration** tab.

Note: If you answered ‘No’ to Question 17, you are not required to provide an answer for Question 19.

Question 20: *If you answered ‘Yes’ to Question 18, does your company annually submit a certification to the US Federal Government Contracting Officer or prime contractor showing (i) it has implemented its compliance plan; and (ii) after conducting due diligence, either – (a) to the best of your company’s knowledge and belief, neither it nor any of its agents, subcontractors, or their agents is engaged in any such activities; or (b) if abuses have been found, your company or subcontractor has taken the appropriate remedial and referral actions..*

Prior to answering this question, refer to the **Glossary** tab to define ‘prime contractor’, ‘compliance plan’ and ‘agent’.

If you answered ‘Yes’ to Question 18 and your company annually submits a certification to the US Federal Government Contracting Officer or prime contractor that meets the requirements outlined in Question 20, answer ‘Yes’ to this question. If you answered ‘Yes’ to Question 18, but your company does not submit such a certification, then the answer to Question 20 is ‘No’.

If ‘Yes’ the **Supporting Documentation Required** tab will indicate ‘Policy Required’ in red. Choose the ‘URL’ or ‘File’ option from the drop down in the **URL or File** column. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** column of the **Declaration** tab.

Note: If your answer to Question 17 was ‘No’ you are not obligated to answer Question 20.

CERTIFICATION

Certification: *Do you certify that all the answers provided in this document are true and accurate to the best of your knowledge and understanding, and commit to providing evidence to support all of your answers if and as required by your customer?*

If you certify that all the answers provided in this document are true and accurate to the best of your knowledge and understanding, and commit to providing evidence to support all of your answers if and as required by your customer, answer 'Yes' to this section. If your answer is 'No', the STRT will be invalid.

Countries

The **Countries** tab contains the list of Tier 2, Tier 2 Watchlist, Tier 3, and Special Case countries according to the US Department of State's 2017 Trafficking in Persons report (updated annually). **This list is required in order to answer Questions 1 and 2 of the STRT.**

Users may use this tab for reference to answer Question 1 and 2. They may use the dropdown in the Selection column next to countries to select 'Yes' if their company, or their suppliers, operate in those countries. The default selection is 'No'. If users answer 'Yes' to Question 1 of the STRT, at least one selection **MUST** be made on the **Countries** tab.

Industries

The **Industries** tab contains a list of industries in which human trafficking activities are known to occur. **This list is required in order to answer Question 3 of the STRT.**

Before making a selection, users should refer to the **Glossary** to define each of the listed industries.

Users may use this tab for reference to answer Question 3. They may use the dropdown in the Selection column next to the industries to select 'Yes' if their company, or their suppliers, operate in those industries. The default

selection is 'No'. If users answer 'Yes' to Question 3 of the STRT, at least one selection **MUST** be made on the **Industries** tab.

Review

The **Review** tab can be used to verify all required fields of the STRT are completed. Required fields in red indicate information is missing. Required fields in green are complete.

If information is missing from a required field, the **Review** tab indicates which responses are missing and for which question or sub-question.

The **Required Field** column indicates which necessary field needs to be completed, as well as what response you have provided. The tab indicates what supporting documentation is required, and shows you what URL or file you have provided.

Click on the **Go to Question** column for the corresponding field to navigate to the appropriate field on the **Declaration** tab. By using these links on the **Review** tab, users can quickly navigate to missing fields on the **Declaration** tab in order to complete the STRT.

Glossary

The **Glossary** tab can be used to reference terms used throughout the STRT that may be unclear. This tab can be referenced at any time throughout the completion process for guidance, definitions or descriptions. Any question featuring an asterisk (*) has an associated term in the **Glossary** tab which can be referenced as needed.

About Us

The Slavery & Trafficking Risk Template (STRT) was created by a Development Committee comprised of industry partners, subject matter experts, legal experts and other stakeholders. The template is reviewed and updated annually.

If you have any questions or comments concerning the STRT, please contact info@sraglobal.org for assistance.