

# STRT

## SUPPLIER USER GUIDE

### THE INDUSTRY STANDARD TEMPLATE



 SRA

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## 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 mitigations 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

This document explains each tab, along with instructions on how to complete each section.

### Introduction

When completing the STRT, you will begin on the **Introduction** tab. It includes an introduction to the STRT, an explanation of how it works, and an overview of each of the tabs so users are able to complete the template accurately.

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](http://www.sraglobal.org) website. This field is auto-populated by the STRT and is for reference and version control only.

### ORGANIZATION INFORMATION

#### Organization Name

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

#### Organization's Unique Identifier Number or Code (Optional)

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

**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.

#### Organization Address (Optional)

Input your organization's mailing address. If your organization 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 with regard 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 Address

List the authorizing person's email address.

## Authorizing Person's Phone Number

List the authorizing person's phone number (country code + 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.

## 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 fields 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 organization requesting the STRT. The link or digital file name should be included directly into the STRT in the appropriate field.

## Insert URL to Relevant Document(s) or Insert Relevant File Name(s) and Attach Corresponding Document(s) to Submission.

If you are required to submit supporting documentation, include the direct URL to, or the file name(s) of, the documents supporting your answers wherever supporting documentation is required, in the appropriate field within the **Insert URL to Relevant Documents(s) or Insert Relevant File Name(s) and Attach Corresponding Document(s)** column of the **Declaration** tab. Ensure links are valid before submitting the STRT.

## Comments

If you would like to provide additional comments in your responses, you can add them in the appropriate field of the **Comments** column under the **Declaration** tab.

## SCREENING & PRIORITIZATION

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

Prior to answering this question, refer to the **Glossary** tab for the definition of ‘organization’ and ‘operation.’

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, select ‘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, Special Cases and countries known to host or have hosted North Korean labourers according to the US Department of State’s 2019 Trafficking in Persons Report (updated annually).

**Question 2: *Do your suppliers have operations 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’ and ‘operation.’

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, select or type ‘No’ in the **Response** field. If your organization does not work with any suppliers, select or type ‘N/A — We do not work with any suppliers.’

**Question 3: *Does your organization, or do your suppliers have operations in any of the sectors listed on the Sectors tab? If Yes, please select all sectors that apply on the ‘Sectors’ tab.***

Prior to answering this question, refer to the **Glossary** tab for the definition of ‘organization,’ ‘supplier’ and ‘operation.’

This question requires you to identify if your organization and/or your suppliers have operations in any of the sectors listed on the **Sectors** tab. To answer this question, refer to the list of sectors on the **Sectors** tab. A definition of each sector can also be found on the **Glossary** tab. If your organization or your suppliers operate within any of these sectors, select or type 'Yes' in the corresponding **Response** field on the **Declaration** tab. On the **Sectors** tab, select 'Yes' next to any sector 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 organization employ or hire 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 'organization', 'low-skilled work', 'migrant worker', and 'recruiter.'

Select or type 'Yes' if your organization has employed or hired low-skilled foreign or domestic migrant workers, and 'No' if your organization has not in the **Response** field.

**Question 5: Does your organization use recruiters who hire subcontractors to recruit workers?**

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

Select or type 'Yes' in the **Response** field if your organization uses recruiters to hire subcontractors to recruit workers.

Select or type 'No, our recruiters do not hire subcontractors to recruit workers' in the **Response** field if your organization's recruiters do not hire subcontractors to recruit workers.

Select or type 'We don't know if our recruiters hire subcontractors to recruit workers' in the **Response** field if your organization doesn't know if its recruiters hire subcontractors to recruit workers.

Select or type the answer 'N/A — We do not use recruiters' in the **Response** field if your organization does not use recruiters.

**Question 6: Does your organization or any of your suppliers (including contractors) employ or hire North Korean citizens or nationals, directly or indirectly?**

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

Select or type the answer 'Yes' in the **Response** field if your organization or any of its suppliers (including contractors) employ or hire North Korean citizens or nationals, directly or indirectly.

Select or type the answer 'No' in the **Response** field if your organization or any of its suppliers (including contractors) do not employ or hire North Korean citizens or nationals, directly or indirectly.

Select or type the answer 'I don't know' in the **Response** field if your organization doesn't know if it or any of its suppliers (including contractors) employs or hires North Korean citizens or nationals, directly or indirectly.

## POLICY

### **Question 7: Does your organization issue a policy/policies prohibiting workers and agents from the following:**

Prior to answering this question, refer to the **Glossary** tab for the definitions of ‘organization’, ‘policy’, ‘worker’ 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 organization issues and enforces a policy/policies prohibiting workers 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 organization issues and enforces a policy/policies prohibiting workers 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 worker identity or immigration documents?

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

If your organization has a policy in place prohibiting workers and agents from withholding employee identity or immigration documents, 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.

- 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 organization 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 ‘Yes’ in the **Response** field. If not, select or type ‘No.’ If your organization does not use recruiters, select the ‘N/A — We do not use recruiters’ 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 workers or potential workers recruitment fees, according to the definition provided in the **Glossary**? Please note: You must read the definition of recruitment fees to accurately answer this question.

Prior to answering this sub-question, refer to the **Glossary** tab for the definition of ‘worker’ and ‘recruitment fees.’

If your organization issues and enforces a policy/policies prohibiting workers and agents from charging workers 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 ‘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 organization 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, broadly and/or only when required by law or contract’ 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.

## **Question 8: Does your organization issue a policy/policies explicitly ensuring the following?**

- a) The provision or payment of return transportation for all foreign migrant workers at the end of their period of work if they were brought to the country for the purpose of working for your organization (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 ‘organization’, ‘policy’, ‘worker’, ‘migrant worker’, ‘recruiter’, and ‘return transportation’ in the **Glossary** tab.

If your organization 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 work, if they were brought to the country for the purpose of working for your organization, select or type ‘Yes’ in the **Response** field. If your organization has no such policy, or the worker(s) fall under the exceptions outlined in the **Glossary** under ‘return transportation’, select or type ‘No.’ If your organization does not hire foreign migrant workers, select the ‘N/A — We do not hire foreign migrant workers’ 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) That housing provided or arranged for your workers meets host-country housing and safety standards?

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

If your organization issues and enforces a policy/policies ensuring the housing provided or arranged for your organization meets host-country housing and safety stan-

dards, select or type 'Yes' in the **Response** field. If you do not have such policies in place, select or type 'No.' If your organization does not provide or arrange housing, select the 'N/A – We do not provide or arrange housing' 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) That workers, including migrant workers, can cancel their work contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with local law or a collective agreement?

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

If your organization has a policy/policies in place ensuring migrant workers can cancel their work contracts with no financial penalty before they relocate for work, 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.

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

If your organization has a policy/policies in place to ensure wages meet applicable host country legal requirements

or, if there is no legal minimum wage, wages are aligned with the prevailing sector wage, select or type 'Yes' in the **Response** field. If your organization has no such policy in place, 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.

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

Prior to answering this sub-question, refer to the **Glossary** tab for the definitions of 'work agreements', 'worker' and 'recruiter.'

If your organization has a policy/policies in place ensuring all workers, including those hired by recruiters, are provided with detailed and accurate work agreements or similar work papers, prior to relocation in cases where the worker must relocate to perform the work, and in a language understood by the worker, select or type 'Yes, and this applies to all workers whether required by law or by contract', or 'Yes, but only when required by law or by contract' in the **Response** field. If your organization does not have such a policy in place, 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.

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

Prior to answering this sub-question, refer to the **Glossary** tab for the definitions of ‘organization’, ‘worker’ and ‘policy.’

If your organization has a policy/policies in place to ensure document checks (including proof of age documents) of all workers before they begin working to confirm they are allowed to work according to legal standards and applicable organization policies, select or type ‘Yes’ in the **Response** field. If your organization has no such policy in place, 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.

## SUPPLY CHAIN MANAGEMENT

**Question 9: Does your organization issue a policy/policies to its suppliers covering the provisions you selected in Questions 7 and 8?**

Prior to answering this question, refer to the **Glossary** tab for the definition of ‘organization’, ‘policy’ and ‘supplier.’

If your suppliers are required to comply with your policies listed in Questions 7 and 8, select or type ‘Yes’ in the **Response** field. If your suppliers are not required to comply, select or type ‘No.’ If your organization does not work with suppliers, select the ‘N/A — We do not work with any suppliers’ option from the drop-down 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 10: If you answered ‘Yes’ to Question 9, does your organization have contractual terms and conditions that require its suppliers to affirmatively agree to its policy/policies (or equivalent)?**

Prior to answering this question, refer to the **Glossary** tab for the definition of ‘organization’, and ‘policy.’

If you answered ‘Yes’ to Question 9 and your organization does have contractual terms and conditions that require your suppliers to affirmatively agree to your policy/policies (or equivalent), select or type ‘Yes’ in the **Response** field. If you answered ‘Yes’ to Question 9 and your organization does **not** have contractual terms and conditions that require your suppliers to affirmatively agree to your policy/policies (or equivalent), select or type ‘No.’ If your organization does not work with suppliers, select the ‘N/A — We do not work with any suppliers’ option from the drop-down 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 9 and/or 10, does your organization’s policy/policies (or the equivalent) and/or contractual terms and conditions include a flow-down clause?**

Prior to answering this question, refer to the **Glossary** tab for the definition of ‘organization’, and ‘policy.’

If you answered ‘Yes’ to Question 9 and/or 10 and your organization’s policy/policies (or the equivalent) and/or contractual terms and conditions does include a flow-

down clause, select or type 'Yes' in the **Response** field. If you answered 'Yes' to Question 9 and/or 10 and your organization's policy/policies (or the equivalent) and/or contractual terms and conditions does **not** include a flow-down clause, select or type 'No.' If your organization does not work with suppliers, select the 'N/A – We do not work with any suppliers' option from the drop-down 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 12: Does your organization perform formal screening and evaluation of prospective recruiters to determine if they (i) operate in compliance with the law and applicable organization policies, and (ii) observe the 'employee pay' principle of not charging a 'recruitment fee' to workers, as defined in the Glossary?**

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

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

If 'Yes', the **Supporting Documentation Required** column will indicate 'Proof of screening and evaluation of prospective recruiters 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 13: Does your organization engage in due diligence activities to identify, prevent and mitigate risks specific to slavery and human trafficking in the following areas?**

- a) Your operations.
- b) Your direct supply chain.
- c) Your indirect supply chain.
- d) Your labour supply chain.

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'organization', 'operation', 'direct supply chain', 'due diligence', 'human trafficking', 'indirect supply chain', 'labour supply chain', 'slavery', 'modern slavery' and 'supply chain', to answer this question.

If your organization engages in due diligence activities to identify, prevent and mitigate risks specific to slavery and human trafficking in its operations and direct, indirect and labour supply chains, select or type 'Yes' or 'No' in the **Response** field where applicable.

If 'Yes' the corresponding **Supporting Documentation Required** column will indicate 'Proof of due diligence activities' 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:** *If you answered ‘Yes’ to Question 13, does your organization use an independent third party to conduct these due diligence activities?*

Prior to answering this question, refer to the **Glossary** tab for the definition of ‘organization’ and ‘due diligence.’

If you answered ‘Yes’ to Question 13 and your organization uses an independent third party to conduct the due diligence activities mentioned in Question 13, select or type ‘Yes’ in the **Response** field. If you answered ‘Yes’ to Question 13 but your organization does not use an independent third party to conduct said due diligence activities, select or type ‘No.’

If ‘Yes’, the corresponding **Supporting Documentation Required** column will indicate ‘Proof of third party verification 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.

**Note:** If you answered Question 13 with ‘No’, you are not required to provide an answer to Question 14.

**Question 15:** *Does your organization conduct a formal vulnerability assessment of its workers to slavery and human trafficking?*

Prior to answering this question, refer to the **Glossary** tab for the definition of ‘vulnerability assessment’, ‘human trafficking’, ‘modern slavery’, ‘slavery’ and ‘worker.’

If your organization conducts a formal slavery and human trafficking vulnerability assessment of its workers, select or type answer ‘Yes’ in the **Response** field.

If your organization does not conduct a formal slavery and human trafficking vulnerability assessment of its workers, select or type answer ‘No’ in the **Response** field.

If ‘Yes’, the corresponding **Supporting Documentation Required** column will indicate ‘Proof of assessment’ 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.

## TRAINING

**Question 16:** *Do your workers who have direct responsibility for supply chain management and recruitment receive training on how to mitigate risk of slavery and human trafficking?*

Refer to the **Glossary** tab for the definitions of ‘human trafficking’, ‘modern slavery’, ‘slavery’, ‘recruiter’, ‘training’ and ‘supply chain’ to answer this question.

If your organization provides training to workers who have direct responsibility for supply chain management and recruitment on how to mitigate risk of slavery and human trafficking, select or type answer ‘Yes’ in the **Response** field. If not, select or type ‘No.’

If ‘Yes’ the **Supporting Documentation Required** column will indicate ‘Proof of training 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 17:** *Does your organization have a process for workers and agents to report, without fear of retaliation, matters related to slavery and human trafficking?*

Refer to the **Glossary** tab for the definitions of ‘worker’, ‘agent’, ‘human trafficking’, ‘slavery’ and ‘modern slavery’ to answer this question.

If your organization has a process in place for workers and agents to report, without fear of retaliation, matters related to slavery and human trafficking, select or type answer ‘Yes’ in the **Response** field. If not, select or type ‘No.’

If 'Yes' the **Supporting Documentation Required** column will indicate 'Proof of reporting process 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 18: *Does your organization maintain internal accountability standards and procedures to respond to a failure by workers and agents to meet organization policies regarding slavery and human trafficking?***

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

If your organization maintains internal accountability standards and procedures for workers and agents who fail to meet organization standards regarding slavery and human trafficking, select or type answer 'Yes' in the **Response** field. If your organization does not maintain these standards and procedures, select or type 'No.'

If 'Yes' the **Supporting Documentation Required** column will indicate 'Proof of standard 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 19: *Does your organization prioritize the use of ethical recruitment agencies certified by credible assurance schemes?***

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'organization' and 'recruiter.'

If your organization prioritizes the use of ethical recruitment agencies certified by credible assurance schemes, select or type answer 'Yes' in the **Response** field.

If your organization does not prioritize the use of ethical recruitment agencies certified by credible assurance schemes, select or type answer 'No' in the **Response** field.

If your organization does not work with recruiters/recruitment agencies, select the 'N/A — We do not use recruiters' option from the drop-down list.

If 'Yes', the **Supporting Documentation Required** column will indicate 'Proof of prioritization' 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 20: *Does your organization publicly disclose information on its efforts to address human trafficking and slavery? Note: Public disclosures may be compiled to comply with slavery and human trafficking-related regulations.***

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'human trafficking', 'modern slavery', 'slavery', 'California Transparency in Supply Chains Act', 'Australia Modern Slavery Act', 'French Loi relative au devoir de vigilance', and 'UK Modern Slavery Act.'

If your organization publicly discloses information on its efforts to address human trafficking and slavery, select or type answer 'Yes' in the **Response** field. If not, select or type 'No.'

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.

## 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, Special Case countries and North Korean workers according to the US Department of State’s 2019 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 Questions 1 and 2. They may use the dropdown in the Selection column next to countries to select ‘Yes’ if their organization, 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.

## Sectors

The **Sectors** tab contains a list of sectors 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 sectors.

Users may use this tab for reference to answer Question 3. They may use the dropdown in the Selection column next to the sectors to select ‘Yes’ if their organization,

or their suppliers, operate in those sectors. The default selection is ‘No.’ If users answer ‘Yes’ to Question 3 of the STRT, at least one selection **MUST** be made on the **Sectors** 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.

## 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](mailto:info@sraglobal.org) for assistance.