

# STRT

## SUPPLIER USER GUIDE

### THE INDUSTRY-STANDARD TEMPLATE



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## Introduction to the STRT

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
- Sectors
- 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 Unique Identifier Number or Code

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

Input your organization'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 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

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

A blue hyperlink (blue and underlined text) indicates there is guidance, a definition or description located in the **Glossary** tab which will help the user answer the question. You should 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

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)

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 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.*

This question requires users to identify if their in 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 2018 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'.

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 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 '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 sectors, 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 'low-skilled', 'migrant workers', and 'recruiters'.

Select or type the answer '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?**

Select or type the answer ‘Yes’ if your organization uses recruiters to hire subcontractors to recruit workers.

Select or type the answer ‘No, our recruiters do not hire subcontractors to recruit workers’ if your organization does not use recruiters who hire subcontractors to recruit workers.

Select or type the answer “We don’t know if our recruiters hire subcontractors to recruit workers” if your organization doesn’t know if its recruiters hire subcontractors to recruit workers.

**Question 6: Does your organization use recruiters who hire subcontractors to recruit workers?**

Select or type the answer ‘Yes’ 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” if your organization and its suppliers (including contractors) do not employ or hire 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 ‘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 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 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 worker identity or immigration documents?

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

If your organization 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 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 the 'Yes' option in the **Response** field. If not, select or type 'No'. If your organization 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 workers 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 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 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 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'. 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 8: Does your organization issue 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 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 '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, answer the question 'Yes'. If your organization 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 organization 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 workers 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 organization issues and enforces a policy/policies ensuring the housing provided or arranged for your organization 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 organization 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) 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 '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, answer this question 'Yes'. If not, answer this question 'No'. If your organization 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 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, answer this question 'Yes'. If your organization 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) 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' 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, answer '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'. If your organization 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 workers before they begin working to confirm they are allowed to work according to legal standards and applicable organization policies?

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, answer this question 'Yes'. If your organization 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 9:** *Does your organization require your suppliers to accept and comply with your policies listed in Questions 7 and 8 (or equivalent)?*

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 7 and 8, answer this question 'Yes'. If your suppliers are not required to comply, answer this question 'No'. If your organization does not work with suppliers, select the 'N/A' 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 10:** *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 'recruiters' 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**, answer this question with 'Yes'. 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 '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:** *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 ‘human trafficking’, ‘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, answer each question ‘Yes’ or ‘No’ 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 12:** *If you answered ‘Yes’ to Question 11, does your organization use an independent third party to conduct these due diligence activities?*

If you answered ‘Yes’ to Question 11 and your organization uses an independent third party to conduct the due diligence activities mentioned in Question 11, answer ‘Yes’ to this question. If you answered ‘Yes’ to Question 11 but your organization does not use an independent third party to conduct said due diligence activities, the answer to this question is ‘No’.

**Note:** *If you answered Question 11 with ‘No’ or ‘N/A’, you are not required to provide an answer to Question 12.*

**Question 13:** *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’.

If your organization conducts a formal slavery and human trafficking vulnerability assessment of its workers, your answer to this question is ‘Yes’.

If your organization does not conduct a formal slavery and human trafficking vulnerability assessment of its workers, your answer to this question is ‘No’.

## TRAINING

**Question 14:** *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’, ‘slavery’, ‘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, answer this question ‘Yes’. If not, answer this question ‘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 15:** *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 ‘agent’, ‘human trafficking’, and ‘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, answer this question ‘Yes’. If not, answer the question by typing or selecting ‘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.

**Question 16: *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 ‘agent’, ‘human trafficking’, ‘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, answer this question ‘Yes’. 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 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.

## CERTIFICATION

**Question 17: *Does your organization 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 organization 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 organization does not set this requirement, the answer to this question is ‘No’. If your organization does not work with suppliers, select the ‘N/A’ option from the dropdown list.

If ‘Yes’ the **Supporting Documentation Required** column will indicate ‘Proof of certification 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 prioritize the use of ethical recruitment agencies certified by credible assurance schemes?***

If your organization prioritizes the use of ethical recruitment agencies certified by credible assurance schemes, your answer to this question is ‘Yes’.

If your organization does not prioritize the use of ethical recruitment agencies certified by credible assurance schemes, your answer to this question is ‘No’.

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 19: *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’, ‘The California Transparency in Supply Chains Act’, and ‘The UK Modern Slavery Act’.

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 20:** *Is your organization 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 organization is engaged in US federal contracts as a contractor or subcontractor and falls under the requirements outlined in Question 20, select or type 'Yes' into the **Response** field. If your organization is not engaged in US federal contracts, as a contractor or subcontractor, under the requirements outlined in Question 20, answer the question 'No'.

**Question 21:** *If you answered 'Yes' to Question 20, 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 20 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 21 '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 'Proof of public disclosure 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 20 you are not required to answer Question 21.

**Question 22:** *If you answered 'Yes' to Question 20, has your organization 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 organization provided it to each worker in writing?*

If your answer to Question 21 is 'Yes' and your organization 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 21 is 'Yes' and your organization 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 'Proof of dissemination of compliance plan (e.g. link)' 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 20, you are not required to provide an answer for Question 22.

**Question 23:** *If you answered ‘Yes’ to Question 21, does your organization 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 organization’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 organization 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 20 and your organization annually submits a certification to the US Federal Government Contracting Officer or prime contractor that meets the requirements outlined in Question 23, answer ‘Yes’ to this question. If you answered ‘Yes’ to Question 20, but your organization does not submit such a certification, then the answer to Question 23 is ‘No’.

If ‘Yes’ the **Supporting Documentation Required** tab will indicate ‘Annual certification 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 20 was ‘No’ you are not obligated to answer Question 23.

## 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 2018 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 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. 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](mailto:info@sraglobal.org) for assistance.

