

STRT

FREQUENTLY ASKED QUESTIONS



INTRODUCTION

This document provides answers to commonly asked questions about the Slavery and Trafficking Risk Template (STRT). If you still have questions after consulting this FAQ, please [contact us](#) using the form on the Social Responsibility Alliance (SRA) website.

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Section 1: About the Slavery and Trafficking Risk Template

1. What is the STRT?

The STRT is the free, open-source standard data exchange template for human trafficking and modern slavery. Organizations are using it to align their due diligence efforts with standard practice, helping them comply with regulations, improve public disclosures, respond to external scrutiny, and build transparency with suppliers.

2. Why was the STRT developed?

Organizations now face increasing legal requirements and other pressures to prevent and mitigate the risk of human trafficking and slavery in their supply chains by collecting risk and compliance-related data from their suppliers.

The STRT was developed and launched in late 2016 with the goal of serving as a universally accepted, industry-wide template for the collection and sharing of slavery and human trafficking risk, and compliance-related data across supply chains. They are also using it to improve supplier response rates and data quality by minimizing supplier burden through ease-of-use, brevity, and universality.

3. How does the STRT support my human trafficking and slavery compliance program?

Data is the lynchpin of slavery and human trafficking due diligence. Central to due diligence are risk assessment, risk mitigation, supplier engagement and public disclosures of efforts to combat slavery and human trafficking. The STRT was developed to support companies and suppliers with all these essential aspects of due diligence.

Risk assessment

The STRT helps organizations assess risk and compliance at the level of the individual supplier. It does so by collecting data on a supplier's risk mitigation activities and risk exposure profile, enabling organizations to assess the strength of a supplier's activities in relation to its risk exposure.

Risk mitigation

Data collected through the STRT gives organizations actionable insights on how to help their suppliers better mitigate risk of human trafficking and slavery and improve compliance. It also enables organizations to better target their audits using a risk-based approach, and the contents of the declaration can feed into the audit itself. Moreover, it gives organizations insight on how to improve their own supply chain practices, including their supplier code of conducts, to protect workers against labour violations.

Supplier engagement

The STRT includes suppliers in the risk assessment process and, in doing so, helps companies foster constructive dialogue within their supply chain and raise supplier awareness of their commitment to tackling human trafficking and slavery risk.

Public disclosures

The STRT helps organizations develop public disclosure statements that meet best practice standards for effective reporting.

If you have any additional questions or comments, or need clarification on any of the FAQ answers provided in this document, please visit our website at sraglobal.org or contact the Social Responsibility Alliance at info@sraglobal.org

UK Modern Slavery Act: Slavery and Human Trafficking Statement	
Recommended Disclosure Topic Areas	How Does the STRT Help?
The organization's structure, its business and its supply chain	The STRT gives organizations data on the geographical composition and complexity of their supply chain, including suppliers beyond Tier 1. This enables organizations to demonstrate a strong knowledge of their own supply chain in their disclosure statement.
The organization's policies in relation to slavery and human trafficking	The STRT gives organizations data that can be used to improve internal policy documents (including codes of conduct) to better protect workers in their supply chain. This enables organizations to demonstrate their commitment to strong and relevant policies in their disclosure statement.
The organization's due diligence processes in relation to slavery and human trafficking in its business and supply chains	The STRT supports organizations with essential aspects of slavery and human trafficking supply chain due diligence. Using the STRT to collect and share data through the STRT enables organizations to demonstrate the strength of their due diligence program in their disclosure statement.
The parts of the organization's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	<p>The STRT gives organizations data on where there is risk of slavery and human trafficking taking place in their supply chain, including the factors driving their suppliers' overall risk profile. This enables organizations to demonstrate nuanced and in-depth knowledge of their supply chain risk in their disclosure statement.</p> <p>Data collected through the STRT helps inform and prioritize an organization's risk mitigation action. This enables companies to demonstrate a strategic and effective approach to risk mitigation in their disclosure statement.</p>
The organization's effectiveness in ensuring slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	When used at regular intervals, the STRT gives organizations data on changes to supplier risk over time, including changes in how well a supplier is controlling risk through the development and implementation of management systems. This enables organizations to demonstrate year-over-year progress in their disclosure statement and assess the effectiveness of their engagement activities with their supply chains.
The training about slavery and human trafficking available to the organization's staff	The STRT gives organizations data that can be used to inform their suppliers' training needs and – by extension – the training needs of their own staff. This enables organizations to demonstrate effective and relevant staff training in their disclosure statement.

California Transparency in Supply Chains Act: Slavery & Human Trafficking Statement

Required Disclosure Topic Areas	How Does the STRT Help?
<p>Verification of product supply chains to evaluate and address risks of human trafficking and slavery</p>	<p>The STRT gives organizations data on where there is risk of slavery and human trafficking taking place in their supply chain, including the factors driving their suppliers' overall risk profile. This enables companies to demonstrate nuanced and in-depth knowledge of their supply chain risk in their disclosure statement.</p> <p>Data collected through the STRT helps inform and prioritize an organization's risk mitigation action. This enables companies to demonstrate a strategic and effective approach to risk mitigation in their disclosure statement.</p>
<p>Audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains</p>	<p>The STRT gives organizations data that can be used to better target their supplier audits. This enables companies to demonstrate a risk-based approach to auditing in their disclosure statement.</p>
<p>Certification by direct suppliers that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business</p>	<p>The STRT gives organizations data that can be used to improve their commercial agreements with their suppliers to better protect workers. This enables organizations to demonstrate a robust certification requirement in their disclosure statement.</p>
<p>Internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking</p>	<p>The STRT gives organizations data that can be used to improve internal policy documents (including codes of conduct) to better protect workers in their supply chain. This enables organizations to demonstrate their commitment to strong and relevant policies in their disclosure statement.</p> <p>The STRT gives organizations data that can be used to assess the conformance of a supplier's practices with company standards. This enables organizations to demonstrate regular monitoring of supplier conformance to organization standards in their disclosure statement.</p>
<p>Training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products, for company employees and management, who have direct responsibility for supply chain management</p>	<p>The STRT gives organizations data that can be used to inform their suppliers' training needs and — by extension — the training needs of their own staff. This enables organizations to demonstrate effective and relevant staff training in their disclosure statement.</p>

Australian Modern Slavery Act 2018: Slavery & Human Trafficking Statement

Mandatory Disclosure Topic Areas	How Does the STRT Help?
<p>The organization's structure, operations, and supply chain.</p>	<p>The STRT gives organizations data on the geographical composition and complexity of their supply chain (including beyond Tier 1) and provides suppliers with resources to support the completion of the template. This enables companies to demonstrate a strong knowledge of their own supply chain in their disclosure statement.</p>
<p>Risks of modern slavery practices in the organization's operations and supply chain, and other entities it owns or controls.</p>	<p>The STRT gives organizations data on where there is risk of modern slavery in their supply chains, including the factors driving their suppliers' overall risk profile. This shows a nuanced and in-depth understanding of supply chain risk in the disclosure statement.</p>
<p>The organization's action to assess and address modern slavery risks, including due diligence and remediation processes where risks are found within the organization's operations or supply chain, including entities it owns or controls.</p>	<p>The STRT supports organizations with essential aspects of slavery and human trafficking supply chain due diligence. In addition to giving organizations data to identify and prioritize risk, it gives them insight into opportunities for risk mitigation and follow-up action, allowing them to launch an effective remediation process with their suppliers. This shows a strategic and effective approach to addressing risk in the disclosure statement.</p>
<p>How the organization assesses the effectiveness of its actions.</p>	<p>When used at regular intervals, the STRT gives organizations data on changes to supplier risk over time, including changes in how a supplier is controlling risk through the development and implementation of management systems. This enables organizations to demonstrate year-over-year progress in their disclosure statement and assess the effectiveness of their engagement activities with their supply chains.</p>
<p>The consultation process with any entities the organization owns or controls, which may form part of a group reporting principle.</p>	<p>When used as a self-assessment tool, the STRT gives organizations data on risk and opportunities for risk mitigation among entities the organization owns or controls. In this way, the STRT can serve as a basis of meaningful ongoing dialogue between the organization and the entities it owns or controls, demonstrating effective consultation.</p>

4. Does the STRT support Uyghur Forced Labour risk Assessment?

While there are no specific disclosure requirements in relation to the Xinjiang Uyghur Autonomous Region (XUAR), the Uyghur forced Labor Prevention Act (UFLPA) as well as several government advisories and actions have made it imperative for companies to assess for and communicate on how they are managing risks related to sourcing from the region.

The STRT is built to support risk assessment for Uyghur forced labor in the supply chain. STRT 3.1 includes several questions designed to assess the risk of being linked to the Xinjiang region through a commodity-specific traceability approach that cascades down the supply chain, from raw materials to finished goods.

5. How does the STRT support my child labor risk assessment?

The STRT provides support for identifying and mitigation the risk of child labour in an organization's supply chain. By capturing the data in an easy-to-use and shareable format, organizations can apply due diligence with regards to their activities. Central to due diligence are the risk assessment, risk mitigation, supplier engagement, and public disclosure of efforts to combat child labour. The STRT supports organizations and their suppliers with all these essential aspects of due diligence.

Risk mitigation

Collecting data using the STRT gives organizations insight into how to mitigate the risk of child labour and comply with international legislation. With the actionable insights highlighted by the completed STRT, organizations can target their internal and supply chain audits with a risk-based approach. The contents of the supporting documentation provided can feed into the audit. Based on these actions, organizations gain insight into

their own policies and their supply chain allowing them to improve the entire process from internal policies to supplier conduct.

Supplier Engagement

The STRT includes the suppliers in the risk assessment process which fosters constructive dialogue and collaboration throughout the supply chain. By engaging their suppliers, organizations set a standard for operations that encourages suppliers to engage in a similar examination of their policies which could lead to a raised awareness of risks associated with child labour. The entire supply chain can be motivated to engage in ending the risk of child labour within the operations of each organization and supplier.

Public Disclosure

The STRT helps organizations develop public disclosure statements that meet the standards of best practices for effective reporting.

6. What regulations and reporting frameworks does the STRT help my organization's compliance?

The STRT supports organizations with their compliance efforts under all major supply chain-related slavery, human trafficking, and child labour legislation, such as the:

- U.S. Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50).
- UK Modern Slavery Act (Section 54 – Transparency in Supply Chains).
- California Transparency in Supply Chains Act (SB 657).
- French Corporate Duty of Vigilance Law (2017-399).
- Countering America's Adversaries Through Sanctions Act (Title III).
- EU Non-Financial Reporting Directive.

¹According to KnowTheChain, the California Attorney General's guidance on the California Transparency in Supply Chains Act was sent to an estimated 2,600 companies.

²According to data compiled by National Contract Management Association and Deltek, the US Government took 3,856,354 contract actions in 2015.

³According to the UN Principles for Responsible Investment, governments of 38 of the largest 50 economies in the world have, or are developing, disclosure requirements for corporations covering environmental, social and governance issues (2016).

- Australia Modern Slavery Act.
- Section 307 of the US Tariff Act
- Canada Customs Tariff Act (No. 9897.00.00)
- Lieferkettensorgfaltspflichtengesetz (German Act on Corporate Due Diligence Obligations in Supply Chains)
- Åpenhetsloven (Norwegian Transparency Act)
- Article 964 of the Swiss Code of Obligations (Obligationenrecht) (Swiss Conflict Minerals and Child Labor Due Diligence Ordinance)
- Section 307 of the US Tariff Act and related regional-specific Acts

The STRT also helps organizations make disclosures regarding internationally accepted forced labour indicators linked to sustainability reporting frameworks such as the Global Reporting Initiative (GRI).

7. Who can use the STRT?

Organizations of all sizes and sectors around the world are using the STRT to collect and share slavery and human trafficking risk and compliance-related data across their supply chains. Today it has reached over 10,000 organizations. This includes companies among the 2,600 required to disclose under the California Transparency in Supply Chains Act (SB 657), the 12,000 required to disclose under Section 54 of the UK Modern Slavery Act, as well as the companies awarded one or more of 3.8 million contracts issued by the US Government in 2015. This also includes the approximately 3,000 entities required to report under the Australian Modern Slavery Act 2018. More broadly, the STRT is used by companies operating in the world's largest economies, 76 percent of which have or are developing disclosure requirements for corporations on environmental, social and governance issues.

8. Do human trafficking and slavery regulations recommend companies use this template?

None of the regulations listed under Question 4 (above) make any specific recommendations on the template organizations should use as part of their compliance efforts. However, all these laws encourage, and in some cases require, organizations to conduct due diligence. Central to due diligence are risk assessment, risk mitigation, supplier engagement and public disclosures. The STRT was developed to support organizations and suppliers with all these essential actions, allowing them to align themselves with standard practice.

9. Who is maintaining the STRT?

The STRT Development Committee actively maintains and updates the STRT to ensure it reflects new research and evolving industry needs. The Development Committee is a multi-stakeholder, consensus-based consortium of corporations, civil society, legal and audit firms, and various industry stakeholders.

The Development Committee is accepting nominations for additional members in certain stakeholder groups. If you are interested in joining the initiative, please [contact us](#) for further information.

10. Why was the STRT designed as an Excel-based survey?

The STRT was created in an Excel-based format to allow suppliers to efficiently and easily complete, share and update the template. It also allows organizations to easily collate and analyze data from their suppliers given it integrates well with internal and external IT compliance systems.

11. Where can I download the STRT?

The STRT is available for download free of charge at www.sraglobal.org.

Section 2: Using the Slavery and Trafficking Risk Template to Survey My Supply Chain

12. Who in my supply chain do I need to collect STRTs from?

Who organizations target will depend on the complexity and size of their supply chain, resources, stakeholder expectations, compliance requirements, internal commitments, and current compliance and risk assessment practices. When making this assessment, organizations should consider service providers that may not be included in traditional supply chain risk assessments yet can present significant risk of slavery and human trafficking (e.g. office cleaners, labourers, or cafeteria workers, as well as construction and recruitment services). Organization can leverage the STRT to assess risk at all levels of their supply chain.

13. How often do I need to collect STRTs from my suppliers?

Organizations should collect updated STRTs from their suppliers on an annual basis to track supply chain risk over time and foster supplier engagement. The STRT Development Committee updates the template annually to reflect the latest risk data from the U.S. Department of State's Trafficking in Persons Report. By collecting STRT data annually, organizations are empowered to publish updated annual statements, conduct efficient due diligence, review and improve their compliance plans as needed and demonstrate improvement on the risks assessed by the STRT in previous years.

However, a company's internal and external commitments may shorten or lengthen the frequency with which they collect STRTs from their suppliers. Suppliers should look to their customers for guidance.

14. How do I get my suppliers to submit their STRTs and what do I do if my suppliers provide incomplete or invalid

STRTs, or fail to provide an STRT at all?

Companies can use a range of strategies to achieve high STRT response rates. These include:

- Clearly defining and communicating organizational human trafficking and slavery standards, expectations, and requirements in tandem with the STRT send-out.
- Situating these standards, expectations, and requirements as part of a broader human rights movement, rather than the individual actions of your own company.
- Including in communications the group name that suppliers receive orders from (ex: business units, plant names) to ensure they recognize your company.
- Communicating in a language the supplier understands.
- Providing suppliers with access to support and resources to assist in the completion of the STRT.
- Highlighting how the STRT minimizes supplier burden.

If your suppliers provide incomplete or invalid STRTs, or fail to submit the STRT to you, your company can take several steps, including:

- Following up with an email or conversation to communicate the importance of completion and address any challenges they may be facing in completing the STRT
- Providing suppliers with additional resources to support the completion of the STRT
- Providing suppliers with training on your policies and code of conduct on human trafficking in supply chains

If your supplier consistently fails to submit a complete STRT, you have the option to automatically score them as 'high risk' and take the appropriate

next steps in line with your due diligence strategy.

15. How do I verify the information my suppliers provide is accurate?

By submitting the STRT, suppliers are declaring the information provided is accurate and complete to the best of their knowledge. Suppliers must provide direct links to supporting documentation for each relevant question, or if a direct link is not available, they are requested to provide supporting documentation if, and when, required by their customer. Like all self-disclosures, the STRT is meant to both inform, and be supported by, further risk assessment efforts such as data triangulation, audit findings and a whistleblower hotline. Suppliers should be made aware they can be audited against the answers provided in their STRT disclosure.

16. Are data validation algorithms built into the STRT?

Yes. These algorithms ensure the answers submitted are appropriate and that key issues are identified. For example, invalid or incomplete questions will be highlighted in the Review tab of the STRT.

17. Are risk scoring algorithms built into the STRT?

No. Each question in the STRT provides answer options that either present potential risk or no potential risk. However, it is ultimately up to you to decide on your overall risk scoring system based on the needs and priorities of your organization. The SRA has developed a scoring guide that you can use to generate a risk score. This is available on the SRA website. If you need support or recommendations in relation to risk scoring, visit our website's Resources or Contact Us page.

18. What do I do if my supplier(s) is identified as high-risk, medium-risk, or low-risk?

Once you have used supplier responses from the STRT to identify high-risk suppliers, you need to take further action to mitigate these risks. Continuous improve-

ment plans will ideally be developed for all suppliers, including low-risk suppliers. If this is not possible, focus should primarily be on high-risk or consistently unresponsive suppliers. The actions taken should be determined based on company capacity, resources and relationship with suppliers, and can extend beyond direct supplier engagement to bilateral and multi-stakeholder initiatives.

19. Is the STRT an appropriate tool for engaging service providers on modern slavery issues?

Modern slavery risks are not limited to trade or manufacturing suppliers. Service providers — such as those that provide catering, security, office cleaning, logistics, and distribution services — could also be linked to modern slavery, primarily through their own workforce. Their workers may be drawn from highly vulnerable groups, such as temporary migrant workers or new immigrants who are susceptible to exploitation. The STRT can be used to identify the inherent risks in a service provider's workforce, based on the characteristics of the workforce and how employees are recruited. It can also be used to assess the strength of a service provider's management systems and opportunities for improvement.

20. Is the STRT an appropriate tool for engaging small businesses on modern slavery issues?

While the risk of slavery and human trafficking within the supply chains of a multinational typically stems from the smaller and medium-sized businesses in that chain, these companies are also less likely to have the adequate resources, formal processes, and strong management structures required to manage these risks. However, the UN Guiding Principles - which are the definitive standard on business responsibility to respect human rights - set out an expectation that all business enterprises, regardless of size and location should have adequate policies and processes in place to identify and address human rights issues, such as

slavery and trafficking. The STRT provides a simplified and relatively cost-effective way for such companies to quickly identify and assess the areas of their business where the risk of modern slavery lies.

If you have any additional questions or comments, or need clarification on any of the FAQ answers provided in this document, please visit our website at www.sraglobal.org or contact the STRT at info@sraglobal.org.

Section 3: Suppliers & the STRT

21. Why am I being asked to submit an STRT?

You have been asked to complete an STRT either because your customer is in scope of one or several slavery and human trafficking regulations, and/or they are collecting data to satisfy their own internal standards and commitments. Being asked by your customer to submit an STRT does not mean that your customer suspects you are engaged in slavery and human trafficking activities. It is simply a template your customer is using as part of their wider due diligence efforts to address and mitigate risks of slavery and human trafficking in their supply chain.

22. What is valid supporting documentation?

Supporting documentation is valid when it matches the type of documentation requested (for example, a policy or code of conduct) and is official in nature.

23. How do suppliers provide supporting documentation to their customers?

You are requested within the template to either provide direct links to supporting documentation for each relevant question, or if a direct link is not available, provide supporting documentation if and when required by your customer. Most customers require their suppliers to submit any supporting documentation at the time of STRT submission.

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