STRT 3.2 OVERVIEW

SLAVERY & TRAFFICKING RISK TEMPLATE

Expanding slavery, human trafficking, and child labour legislation and internal ethical sourcing policies have introduced broad due diligence requirements to the global marketplace. The Slavery and Trafficking Risk Template (STRT) provides a point of entry for meeting these expanding requirements and safe-guarding supply chains against illegal labour practices.

What Is the STRT?

The STRT is the free, open-source standard data exchange template for identifying potential occurrences of slavery, human trafficking, and child labour in an organization's supply chain. Organizations use it to align their due diligence efforts with standard practices, helping them comply with regulations, improve pub-

lic disclosures, respond to external scrutiny, and build transparency with suppliers.

The STRT is a widely used, universally accepted standard data exchange template for slavery, human trafficking, and child labour.

Why Was the STRT Created?

Quality data is the lynchpin for ensuring an organization is applying due diligence in their operations and supply chain as regards slavery, human trafficking, and child labour. The STRT results in a single, standard template for exchanging data on slavery, human trafficking, and child labour within the organization, its supply chain, and customers. The information captured in the STRT helps organizations cope with the expanding volume of increasingly complex data requirements.

The STRT is updated annually by a multi-stakeholder Development Committee to ensure it is consistent and current with industry needs.

The STRT is a widely-used, universally-accepted standard data exchange template for human trafficking and modern slavery.

How Does the STRT Work?

The STRT is an easy-to-use questionnaire provided in a Microsoft Excel workbook. Using the STRT workbook, organizations can collect and collate data from their supply chain associated with indicators of slavery, human trafficking, child labour, and compliance with the relevant legislation. Suppliers complete a short survey and provide supporting documentation, as required. Organizations collecting data using the STRT apply a scoring methodology to better understand which suppliers are considered a risk and where they need to follow up.

What Regulations Does the STRT Cover?

The STRT supports organizations with their compliance efforts under all major supply chain-related legislation focused on slavery, human trafficking, and child labour. Some of these regulations are:

- The US Federal Acquisition Regulation (FAR) final rule on Combating Trafficking in Persons (52.222-50)
- The UK Modern Slavery Act (Section 54 – Transparency in Supply Chains)
- The California Transparency in Supply Chain (SB657)
- The EU Non-Financial Reporting Directive
- The French Loi relative au devoir de vigilance des sociétés mères et des entreprises doneuses d'ordre (Loi 2017-399)
- Countering America's Adversaries Through Sanctions Act (Title III)
- The Australia Modern Slavery Act (No. 153, 2018)
- Section 307 of the US Tariff Act and related regional-specific acts
- The Canadian 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 Labour Due Diligence Ordinance)

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

What's New in STRT 3.2?

Version 3.2 of the STRT includes revisions designed to maintain its value as a compliance tool that supports traceability on all high risk sectors for forced labor enforcement. In addition to reflecting recent changes to critical reference sources like the US Department of Labor's Bureau of International Labour Affairs (ILAB) List of Goods Produced by Child Labor or Forced Labor, STRT 3.2 also takes into consideration regulatory enforcement practices to include goods which, although not included in the reference sources, have legitimate regulatory weight behind them in the form of enforcement actions.

STRT 3.2 also responds to user feedback through the inclusion of functionalities that enhance the usability of the template.

Changes include:

1. Renaming "Goods Scope" within the Declaration tab to "Goods of Potential Concern" in

order to more clearly communicate the nature of the goods listed in the Source Country tab. This helps address concerns that the goods selection available is not comprehensive enough to cover every industry.

2. Update to the "Introduction" tab to include instructions for "Goods of Potential Concern" in order to increase user's understanding of why the goods scope options are limited.

3. Update to the Instructions on the "Declaration Tab" to provide greater clarity for users on how to share supporting documentation.

4. Updates to the "Source Countries" tab and the "Goods of Potential Concern" options to bring the STRT in alignment with the latest resources. The updates reflect changes found in the most current version of the US Department of Labor's Bureau of International Labour Affairs (ILAB) List of Goods Produced by Child Labor or Forced Labor report. This includes the removal of goods that have been removed from the ILAB list, and the addition of new goods and downstream goods produced with inputs with child labor or forced labor in line with the ILAB report.

5. Addition of Aluminum and PVC sourced in China to the list of goods found in the "Source Countries" tab, to ensure the STRT accurately reflects current enforcement priorities of regulatory bodies.

6. Update to the introductory verbiage in the "Source Countries" tab to indicate that the reference sources for the list of goods and their

source countries contained in that tab are the US Department of Labor's Bureau of International Labor Affairs (ILAB) 2022 List of Goods Produced by Child Labor or Forced Labor, List of Products Produced by Forced or Indentured Child Labor, and the practices of enforcement bodies.

7. Updates to the Sectors tab to bring the STRT in alignment with the latest resources. The updates reflect changes found in the latest version of the Global Estimates of Modern Slavery report.

8. Added functionality to autopopulate question responses when "N/A" is selected for certain questions, in order to prevent users having to answer additional questions related to the question for which "N/A" has been selected. This reduces the time it takes users to complete the STRT.

9. Added "N/A" option to: Q21 that asks users what percentage of their relevant suppliers have provided a response to due diligence surveys. This enables users that do not work with any suppliers to skip that question.

10. Added a tooltip to the "date of completion" cell to assist users with the completion of the date field and clarify the required format as (YYYY/MM/DD).

11. Added text wrapping functionality to the "Comments" field so that text is fully visible.

How Does the STRT Benefit Organizations?

With the STRT, organizations can secure actionable data based on their supply chains. This information is organized and presented in a standard format, making it easy to assess and direct their supply chain relationships towards the international market and legislation requirements. With the report generated by the STRT, organizations can align their due diligence efforts with standard practices and improve the quality of supplier responses for evaluation. Using this information enhances an organization's ability to enhance the impact of follow-up actions. It also improves supplier response rates through its ease-of-use, multilingual functionality, brevity, and universality.

Where to Get More Information

For more information on the STRT, and to download the template, visit: **http://www.sraglobal.org/**.