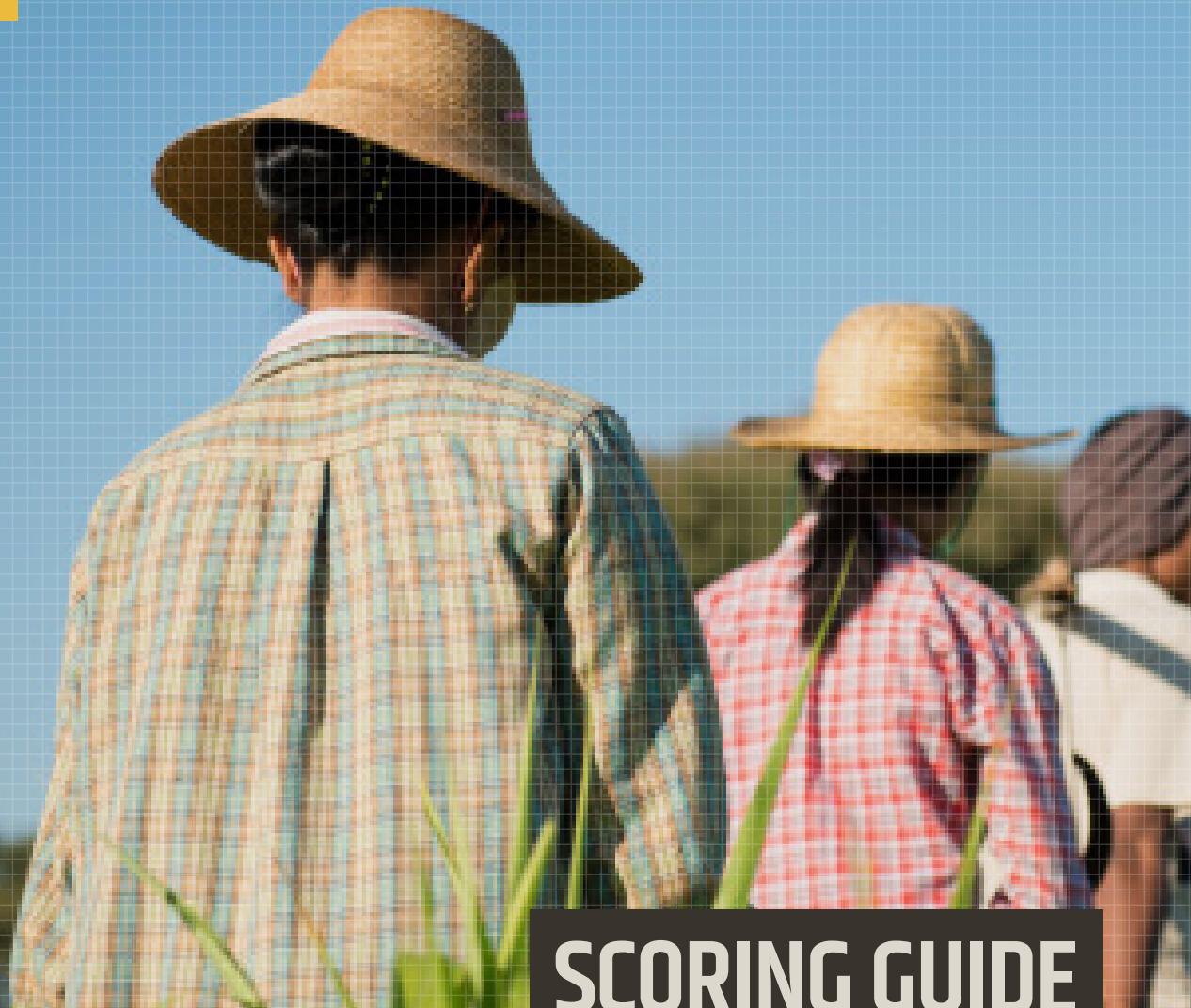




SRA

SLAVERY & TRAFFICKING RISK TEMPLATE (STRT)

VERSION 3.2



SCORING GUIDE

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PART 1: OVERVIEW

Purpose of This Guide

This guide aims to help your organization score data it has collected from suppliers using the Slavery and Trafficking Risk Template (STRT). While collecting the data itself is an important undertaking, scoring the data will allow you to action your findings to drive change within your supply chain.

Introduction to Scoring With the Slavery & Trafficking Risk Template (STRT)

The STRT collects data from the supply chain on indicators of human trafficking and slavery risk, and compliance with relevant legislation. Once your suppliers have returned the survey, and you've verified any supporting

documentation, you can apply a scoring methodology to better understand which suppliers are at risk, and where to follow up.

Organizations can generate scores on a range of different parameters, as described in this guide, using data collected from their suppliers via the STRT. Risk scoring allows organizations to prioritize suppliers for follow-up risk mitigation and preventive action, and track supplier progress quantitatively over time. Both benefits contribute to strong reporting, enabling organizations to disclose annual, data-driven due diligence performance to regulatory bodies, investors, consumers, and other stakeholders.



Scoring at a Glance

Organizations can generate scores on a range of different parameters using data collected from their suppliers via the STRT. These parameters include the following:

HUMAN TRAFFICKING & SLAVERY RISK

What does it measure?

A supplier's vulnerability to trafficked and slave labour occurring in their own operations and/or in their supply chain.

How are suppliers categorized?

Indeterminate, low-risk (low levels of inherent risk), low-risk (adequate risk control), medium-risk (partial risk control), high-risk (inadequate risk control), and high risk (high levels of inherent risk).

CHILD LABOUR RISK

What does it measure?

A supplier's vulnerability to child labour occurring in their own operations and/or in their supply chain.

How are suppliers categorized?

Indeterminate, low-risk (low levels of inherent risk), low-risk (adequate risk control), medium-risk (partial risk control), high-risk (inadequate risk control), and high risk (high levels of inherent risk).

COMPLIANCE WITH THE US FEDERAL ACQUISITION REGULATION (FAR) FINAL RULE ON COMBATING TRAFFICKING IN PERSONS (52.222-50)

What does it measure?

An indication of a supplier's compliance with the US FAR Final Rule on Combating Trafficking in Persons (52.222-50).

How are suppliers categorized?

Indication of non-compliance, indication of compliance, and indeterminate.

COMPLIANCE WITH THE UYGHUR FORCED LABOR PREVENTION ACT

What does it measure?

The risk of a supplier having operational and/or supply chain links to the Xinjiang Uyghur Autonomous Region (XUAR) of China.

Scoring at a Glance

How are suppliers categorized?

Confirmed links, high-risk, medium-risk, low-risk.

COMPLIANCE WITH TITLE III OF THE COUNTERING AMERICA'S ADVERSARIES THROUGH SANCTIONS ACT

What does it measure?

An indication of a supplier's compliance with Title III of the Countering America's Adversaries Through Sanctions Act (CAATSA).

How are suppliers categorized?

Indication of non-compliance, indication of compliance, and indeterminate.

COMPLIANCE WITH A SUPPLIER CODE OF CONDUCT

What does it measure?

A supplier's compliance with an organization's supplier code of conduct.

How are suppliers categorized?

Indication of non-compliance, compliance, and indeterminate.

PART 2: GENERATING A HUMAN TRAFFICKING & SLAVERY RISK SCORE

Introduction

Organizations can use data collected from their suppliers using the STRT to generate a human trafficking and slavery risk score.

The below outlines different supplier categorizations, as well as a step-by-step risk-scoring methodology for generating a human trafficking and slavery risk score. It also identifies various guiding principles for organizations to follow when defining their own risk scoring algorithm. It includes a sample algorithm that organizations can implement or adapt based on their own needs, risk tolerance, and priorities.

Supplier Categorization

The slavery and human trafficking risk scoring methodology, described below, sorts suppliers into different categories, with the following interpretations.

Suppliers operating in a low-risk industry, low-risk geography with a low-risk workforce → low levels of in-

herent risk → **low-risk (low levels of inherent risk)**

Suppliers exposed to very high levels of inherent risk that cannot be mitigated through adequate risk controls → very high levels of inherent risk → **high-risk (high levels of inherent risk)**

Suppliers operating in a high-risk industry, high-risk geography, and/or with a high-risk workforce (high to moderate inherent risk) with policies, practices, and procedures in place that:

- adequately control risk → **low risk (adequate risk control)**
- partially control risk → **medium-risk (partial risk control)**
- do not adequately control risk → **high-risk (inadequate risk control)**

Suppliers that have not provided the data needed to generate a human trafficking and slavery risk score → indeterminate

For ease of reference, please see the table below for an overview of these risk categories and their meaning:

		INHERENT RISK		
		Very high	High to Moderate	Low
RISK CONTROL	Adequate	High-Risk (High Levels of Inherent Risk)	Low-Risk (Adequate Risk Control)	Low-Risk (Low Levels of Inherent Risk)
	Partial	High-Risk (High Levels of Inherent Risk)	Medium-Risk (Partial Risk Control)	Low-Risk (Low Levels of Inherent Risk)
	Inadequate	High-Risk (High Levels of Inherent Risk)	High-Risk (Inadequate Risk Control)	Low-Risk (Low Levels of Inherent Risk)

Risk Scoring Methodology

The methodology described below is a step-by-step categorization of suppliers in relation to the slavery and human trafficking risk categories described above.

Step 1: Is the supplier exposed to very high levels of inherent risk that cannot be mitigated through adequate risk controls?

STRT Questions 1 to 10: Screening and Prioritization evaluate risk inherent to a supplier’s geography, industry, and workforce. Some of these questions may relate to issues that present such a high level of inherent risk that the user may not want the supplier to be able to lower its risk through adequate risk controls. In these instances, the supplier is categorized as high-risk due to high levels of inherent risk. Otherwise, scoring advances to the next step.

Step 2: Has the supplier provided the data needed to generate a human trafficking and slavery risk status?

STRT question ‘topics scope’ within the Organization Information section of the template indicates the topics covered by the supplier’s Declaration. This selection impacts how a supplier responds to a number of questions in the STRT, such as questions 18, 23 and 24. If a supplier has selected “child labour” for ‘topics scope’, they are categorized as indeterminate because they

have not provided the data needed to generate a human trafficking and slavery risk status. If a supplier has selected “human trafficking and slavery” OR “human trafficking, slavery and child labour”, scoring advances to the next step.

Step 3: Is the Supplier Operating in a Low-Risk Geography, Low-Risk Industry With a Low-Risk Workforce?

STRT Questions 1 to 10: Screening and Prioritization evaluate risk inherent to a supplier’s geography, industry, and workforce. The cumulative score for these questions determines whether further investigation is needed to assess how well the supplier is managing the risk of slavery and human trafficking in its operations and supply chain. If a supplier’s responses to Questions 1 to 10 fall below the assigned threshold, the supplier is categorized as low-risk due to its low inherent risk. If it exceeds the threshold, scoring advances to the next step.

Step 4: Is the Supplier Adequately Controlling for Risk?

Questions 11 to 28 in the STRT assess how well the supplier is controlling for risk. The cumulative score for these questions determines whether the supplier is adequately controlling for risk.



If a supplier's responses to Questions 11 to 28 fall below the assigned threshold, the supplier is categorized as low-risk due to the adequacy of its risk mitigation practices, policies, and procedures. If it exceeds the threshold, scoring advances to the next step.

You'll note that a supplier is only eligible for this low-risk category if it has strong policies, practices, and procedures in place to mitigate and prevent risk. The number of points acquired from Questions 1 through 10 is irrelevant to this calculation and is used instead to indicate that this calculation is needed due to the presence of inherent risk.

Users have the option of adding further nuance to their evaluations by assessing operational risk, supply chain risk, and labour supply chain risk separately. This would require an assessment of inherent risk across all three categories paired with an assessment of the strength of the suppliers' controls relevant to each.

Step 5: Is the Supplier Partially Controlling for Risk?

The cumulative score for Questions 1 to 28 in the STRT, which assesses both the supplier's inherent risk and risk management practices, determines whether the supplier is categorized as medium-risk or high-risk.

If a supplier's responses to Questions 1 to 28 exceed the number of points required to be categorized as a medium-risk supplier, the supplier is automatically categorized as high-risk; otherwise, it is medium-risk. This approach provides a holistic picture of a supplier's risk level by considering a supplier's risk exposure and the adequacy of its management practices together.

Risk Scoring Algorithms

A. SETTING THE THRESHOLD

The threshold between the different risk categories can be set high or low, depending on an organization's risk tolerance, prior actions, priorities, and other factors. When setting these thresholds, organizations should follow these guiding principles.

Guiding Principles for Setting the Threshold

- **Trigger Questions:** Organizations can choose to designate one or more questions in the STRT as "trigger questions," whereby a specific response to a "trigger question" disqualifies a supplier from a particular risk category. For example, if an organization sets the threshold for low-risk (low levels of inherent risk) at nine points and assigns 10 points to Question 1 (the "trigger question"), a single risk response for Question 1 would move the supplier out of the low-risk category. This strategy can, of course, be used on an aggregate level with more than one question.
- **Useful Spread:** Organizations can choose to adjust the threshold between medium and high-risk until they achieve a useful spread between the two risk categories. This way, organizations can identify a manageable number of high-risk suppliers to prioritize and target for their risk mitigation and prevention outreach efforts. Organizations are cautioned against using this principle for the two low-risk thresholds in order to preserve the meaning of these two categories.
- **Integrity of Supplier Categorizations:** When setting the threshold between the different risk categories, organizations should do so in a manner that ensures each supplier category retains its original meaning and/

or is updated to reflect the new meaning. In other words, the threshold for the low-risk (low levels of inherent risk) category should be set in a way that only includes suppliers “operating in a low-risk geography, low-risk industry with a low-risk workforce,” or else it needs to be revised. Similarly, the threshold for the other low-risk category (adequate risk control) should be set in a way that only includes suppliers that “adequately control risk.” The medium-risk and high-risk categories allow for more subjective interpretation and, as a result, are more adaptable.

B. POINT ALLOCATION

The points assigned to various responses can be set high or low depending on an organization’s needs and priorities, including risks present in their sector. When defining point allocation, organizations should follow these guiding principles.

Guiding Principles for Allocating Points

- **Missing Responses:** When a question requiring a response is left blank, the supplier should receive the higher risk score for the response.
- **Non-Congruence:** When a response is given that is incompatible with a response to another question, both responses should receive the higher-risk score.
- **Question Weighting:** Points are allocated based on the impact each question has on slavery and human trafficking risk. Some questions have no relevance to slavery and human trafficking risk, and instead relate to a separate risk scoring category, and should therefore be allocated zero points.
- **Supporting Documentation:** Points are deducted when adequate supporting documentation is not given. When possible, organizations should review supporting documentation to confirm its adequacy.

C. RISK SCORING ALGORITHMS: A SAMPLE APPROACH

The sample approach, described below, identifies a possible approach to assigning points to questions in the STRT, as well as different thresholds for each risk category. This sample risk scoring approach is not intended to be prescriptive, but rather to serve as an example for an organization when designing its own risk scoring algorithm.

Sample Approach

1. SCENARIO

Organization Alpha operates in a sector where slavery and human trafficking risk is known to manifest itself among the organization’s first-tier suppliers and beyond.

It is interested in gaining an understanding of its suppliers’ vulnerability to trafficked and slave labour occurring in their operations and supply chain, so it has asked its suppliers to submit an STRT declaration that covers “human trafficking and slavery” (topics scope).

It wants suppliers that may be linked with persons working with the Xinjiang Uyghur Autonomous Region govern-

ment for purposes of the “poverty alleviation” program or the “pairing assistance” program to be classified as high risk (high levels of inherent risk) to facilitate further due diligence and targeted follow-up action.

It bases its country risk ratings on the Global Slavery Index.

It is also concerned about the following high-risk goods in its supply chain: polysilicon, stones, electronics, iron, and rubber, so it has asked its suppliers to submit an STRT declaration that covers these goods (goods scope). According to the US Department of Labor’s Bureau of International Labor Affairs (ILAB) 2020 List of Goods Produced by Child Labor or Forced Labor and List of Products Produced by Forced or Indentured Child Labor, these goods are produced using forced labor in the following countries/jurisdictions:

- Polysilicon: China
- Stones: India and Nepal
- Electronics: China and Malaysia
- Iron: North Korea
- Rubber: Burma

2. OVERVIEW

a. High-Risk (High Levels of Inherent Risk) Category

In this approach, suppliers that have selected “Yes” for Question 9 and/or 10 are categorized as high-risk (high level of inherent risk). Questions 9 and 10 relate to a supplier’s link to the Xinjiang Uyghur Autonomous Region (XUAR) of China and/or persons working with the XUAR government for purposes of the “poverty alleviation” program or the “pairing assistance” program.

b. Indeterminate Category

If a supplier has selected “child labour” for ‘topics scope’, they are categorized as indeterminate because they have not provided the data needed to generate a human trafficking and slavery risk status. If a supplier has selected “slavery and human trafficking” OR “slavery, human trafficking, and child labour”, scoring advances to the next step.

c. Low-Risk (Low Levels of Inherent Risk) Category

In this approach, the threshold for a supplier to be considered low-risk is set at below 2.5 points. Points for Questions 1, 2, 3, 6, and 7 are assigned in such a manner that a single answer of “Yes” to any one of them exceeds the number of points required to be categorized as a low-risk (low levels of inherent risk) supplier. This automatically places the supplier into the low-risk (adequate risk control), medium-risk, or high-risk category, based on how they score on the rest of the STRT. In this way, Questions 1, 2, 3, 6, and 7 are “trigger questions.”

As with the rest of the questions in the STRT, points for Questions 1 to 10 are allocated in a way that reflects the impact of each question on slavery and human trafficking risk. They are also allocated in a manner that gives similar weight to questions in the STRT relating to risk in a supplier’s operations and supply chain.

d. Low-Risk (Low Levels of Inherent Risk) Category

The threshold for a supplier to be considered low risk (adequate risk control) is set at nine points. Points for Questions

11 through 28 are assigned in such a manner that a single risk response (e.g., “No” response) to Questions 14 and 17 exceeds this threshold and automatically places the suppliers into the medium-risk or high-risk category, based on how they score on the rest of the STRT. In this way, Questions 14 and 17 are “trigger questions.” They move the supplier out of the low-risk (adequate risk mitigation) category when there is a single instance of a risk response.

As with the rest of the questions in the STRT, points for Questions 11 through 28 are allocated in a way that reflects the impact of each question on slavery and human trafficking risk. They are also allocated in a manner that gives similar weight to questions in the STRT relating to risk in a supplier’s operations and supply chain.

e. Medium & High-Risk Category

The threshold for a supplier to be considered medium risk is set at 40 points. To ensure supply chain risk is adequately considered, points for Questions 1 to 28 are assigned in such a manner that a supplier with risk scores for every supply chain-related question (Questions 3, 4, 10, 14, 15, 16, 18B, 19, 20, 21, 23, 24, 25, 26, and 28) would exceed 40 points and be categorized as high-risk.

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
t			
Goods scope 1	Polysilicon	0	Organization Alpha is concerned about forced labor risks in its polysilicon supply chain
Goods scope 2	Stones	0	Organization Alpha is concerned about forced labor risks in its stone supply chain
Goods scope 3	Electronics	0	Organization Alpha is concerned about forced labor risks in its electronics supply chain
Goods scope 4	Iron	0	Organization Alpha is concerned about forced labor risks in its iron supply chain
Goods scope 5	Rubber	0	Organization Alpha is concerned about forced labor risks in its rubber supply chain

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
Topics Scope	slavery and human trafficking	Eligible for all human trafficking and slavery statuses	Slavery and human trafficking is the focus of Organization Alpha's due diligence efforts
	child labour	Indeterminate	
	slavery, human trafficking, and child labour	Eligible for all human trafficking and slavery statuses	
	Blank	Indeterminate	
Regulatory Scope	All	Eligible for Xinjiang Risk Status	Activates Questions 9 and 10
	Select	Eligible for Xinjiang Risk Status	Deactivates Questions 9 and 10
Screening and Prioritization			
1	Selection that includes at least one high risk country	2.5	Points are based on the supplier's selection on the 'Countries' tab of the STRT. Organization Alpha bases its country risk ratings on the Global Slavery Index. Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category
	Selection that includes one or more medium risk countries and no high-risk countries	1.5	
	Selection that includes one or more low risk countries and no medium or high-risk countries	0	
	Blank	2.5	
2	Yes	2.5	Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category
	Blank	2.5	
	No	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
3 - polysilicon - "my organization produces this good in this source country"	Yes for "China"	2.5	<p>Polysilicon is produced using forced labor in China according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as bananas, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "China"	0	
	No for "China"	0	
	N/A - my organization's products do not contain this good	0	
3 - polysilicon - "my organization sources (directly or indirectly) this good from this source country/jurisdiction"	Yes for "China"	2.5	
	Blank for "China"	0	
	Unknown for "China"	2.5	
	No for "China"	0	
	N/A - my organization's products do not contain this good	0	
3 - stones - "my organization produces this good in this source country"	Yes for "Nepal" and/or "India"	2.5	<p>Stones are produced using forced labor in India and Nepal according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as bananas, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "Nepal" and/or "India"	0	
	No for "Nepal" and "India"	0	
	N/A - my organization's products do not contain this good	0	
3 - stones - "my organization sources (directly or indirectly) this good from this source country/jurisdiction"	Yes for "Nepal" and/or "India"	2.5	
	Blank for "Nepal" and/or "India"	0	
	Unknown for "Nepal" and/or "India"	2.5	
	No for "Nepal" and "India"	0	
	N/A - my organization's products do not contain this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
3 - electronics - "my organization produces this good in this source country"	Yes for "China" and/or "Malaysia"	2.5	<p>Electronics are produced using forced labor in China and Malaysia according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as bananas, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "China" and/or "Malaysia"	0	
	No for "China" and "Malaysia"	0	
	N/A - my organization's products do not contain this good	0	
3 - electronics - "my organization sources (directly or indirectly) this good from this source country/jurisdiction"	Yes for "China" and/or "Malaysia"	2.5	<p>Electronics are produced using forced labor in China and Malaysia according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as bananas, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "China" and/or "Malaysia"	0	
	Unknown for "China" and/or "Malaysia"	2.5	
	No for "China" and "Malaysia"	0	
	N/A - my organization's products do not contain this good	0	
3 - iron - "my organization produces this good in this source country"	Yes for "North Korea"	2.5	<p>Iron is produced using forced labor in North Korea according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as bananas, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "North Korea"	0	
	No for "North Korea"	0	
	N/A - my organization's products do not contain this good	0	
3 - iron - "my organization sources (directly or indirectly) this good from this source country/jurisdiction"	Yes for "North Korea"	2.5	<p>Iron is produced using forced labor in North Korea according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as bananas, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "North Korea"	0	
	Unknown for "North Korea"	2.5	
	No for "North Korea"	0	
	N/A - my organization's products do not contain this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
3 - rubber - "my organization produces this good in this source country"	Yes for "Burma"	2.5	<p>Rubber is produced using forced labor in Burma according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as bananas, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "Burma"	0	
	No for "Burma"	0	
	N/A - my organization's products do not contain this good	0	
3 - rubber - "my organization sources (directly or indirectly) this good from this source country/jurisdiction"	Yes for "Burma"	2.5	
	Blank for "Burma"	0	
	Unknown for "Burma"	2.5	
	No for "Burma"	0	
	N/A - my organization's products do not contain this good	0	
4 (polysilicon)	Yes	0	
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
4 (stones)	Yes	0	
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
4 (electronics)	Yes	0	
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
4 (iron)	Yes	0	Organization Alpha uses answers to this question to guide its corrective actions.
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
4 (rubber)	Yes	0	Organization Alpha uses answers to this question to guide its corrective actions.
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
5	1-100	0	Organization Alpha uses this question to take scale (number of impacted people) into account, which supports its prioritization efforts.
	101-1000	0	
	1001-2000	0	
	2001-5000	0	
	5001-10000	0	
	More than 10000	0	
	Blank	0	
6	14 and younger	2.5	Trigger question: Risk response automatically moves the supplier out of the “low risk (low levels of inherent risk)” category
	15 to 18	1	
	older than 18	0	
	Blank	2.5	
7	Yes	2.5	Trigger question: Risk response automatically moves the supplier out of the “low risk (low levels of inherent risk)” category
	Blank	2.5	
	No	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
8	Yes	2	
	No, our recruiters do not hire subcontractors to recruit workers	0	
	Blank	2	
	N/A - we do not use recruiters	0	
	We don't know if our recruiters hire subcontractors to recruit workers	2	
9	Yes	0	Trigger question: "Yes" response automatically moves the supplier into the "high risk (high levels of inherent risk)" category
	Blank	0	
	No	0	
10	Yes	0	Trigger question: "Yes" response automatically moves the supplier into the "high risk (high levels of inherent risk)" category
	Blank	0	
	No	0	
	Unknown	0	
	N/A - We do not work with suppliers	0	
Policy			
11a	No	0.5	
	Blank	0.5	
	Yes	0	
11b	No	0.5	
	Blank	0.5	
	Yes	0	
11c	No	0.5	
	Blank	0.5	
	Yes	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
11d	No	2	
	Blank	2	
	Yes	0	
11e	No	2	
	Blank	2	
	Yes	0	
	N/A - We do not use re-cruiters	0	
11f	No	0.5	
	Blank	0.5	
	Yes	0	
11g	No	2	
	Blank	2	
	Yes	0	
11h	No	0	Question relates to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	Blank	0	
	Yes, broadly and/or only when required by law or by contract	0	
12a	No	1.5	
	Blank	1.5	
	Yes	0	
	N/A - We do not hire foreign migrant workers	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
12b	No	1.5	
	Blank	1.5	
	Yes	0	
	N/A - We do not provide or arrange housing	0	
12c	No	1.5	
	Blank	1.5	
	Yes	0	
12d	No	1	
	Blank	1	
	Yes	0	
12e	No	0.5	
	Blank	0.5	
	Yes	0	
12f	No	1	
	Blank	1	
	Yes, but only when required by law or by contract	1	
	Yes, and this applies to all employees, even when not required by law or by contract	0	
12g	No	1.5	
	Blank	1.5	
	Yes	0	
13	No	1	
	Blank	1	
	Yes	0	
	N/A - we do not hire foreign or domestic migrant workers	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
Supply Chain Management			
14	No	4.5	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category (as it would also warrant 4 points for Q10 + 1 point for Q11)
	Blank	4.5	
	Yes	0	
	N/A - we do not work with suppliers	0	
15	No	4	
	Blank	4	
	Yes	0	
	N/A - we do not work with suppliers	0	
16	No	1	
	Blank	1	
	Yes	0	
	N/A - we do not work with suppliers	0	
Risk Identification and Management			
17	No	9.5	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category
	Blank	9.5	
	Yes	0	
	N/A - We do not use re-cruiters	0	
18a	No	2.5	
	Blank	2.5	
	Yes	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
18b (polysilicon)	No	1.25	<p>If the supplier included a good in its declaration that is not known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as bananas, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low risk (adequate risk control)" category (as it would also warrant 2 points for Q19 and 2.5 points for Q21)</p>
	Blank	1.25	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
18b (stones)	No	1.25	
	Blank	0	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
18b (electronics)	No	1.25	
	Blank	0	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
18b (iron)	No	1.25	
	Blank	0	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
18b (rubber)	No	1.25	
	Blank	0	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
18c	No	1.5	
	Blank	1.5	
	Yes	0	
	N/A - We do not use re-cruiters/Our recruiters do not use subcontractors	0	
19	No	2	
	Blank	2	
	Yes	0	
20	No	0.5	
	Blank	0.5	
	Yes	0	
21	100%	0	
	Greater than 90%	1	
	Greater than 75%	1.5	
	Greater than 50%	2	
	50% or less	2.5	
	Blank	2.5	
22	No	2.5	
	Yes	0	
	Blank	2.5	
Training			
23	No	5	
	Blank	5	
	Yes	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
Reporting and Internal Accountability			
24	No	1.5	
	Blank	1.5	
	Yes	0	
25	No	1.5	
	Blank	1.5	
	Yes	0	
26	No	0.5	
	Blank	0.5	
	Yes	0	
Certification			
27	No	1	
	Blank	1	
	Yes	0	
	N/A - we do not use re-cruiters	0	
Public disclosure			
28	Yes	0	Question relates to compliance with public disclosure regulations
	No	0	
	Blank	0	

THRESHOLDS						
	High-Risk (High Levels of Inherent Risk)	Indeterminate	Low-Risk (Low Levels of Inherent Risk)	Low-Risk (Adequate Risk Control)	Medium-Risk (Partial Risk Control)	High-Risk (Inadequate Risk Control)
Sample Approach	Questions 9 and/or 10 answered "Yes"	'Topics Scope' covers child labour	<u>Cumulative score for Questions 1 to 10</u> : Below 2.5 points	<u>Cumulative score for Questions 11 to 28</u> : 9 points or below	<u>Cumulative score for Questions 1 to 28</u> : 40 points or below (out of a possible 100 points)	<u>Cumulative score for Questions 1 to 28</u> : Greater than 40 points (out of a possible 100 points)

PART 3: GENERATING A CHILD LABOUR RISK SCORE



Introduction

Organizations can use data collected from their suppliers using the STRT to generate a child labour risk score.

The below outlines different supplier categorizations, as well as a step-by-step risk-scoring methodology for generating a child labour risk score. It also identifies various guiding principles for organizations to follow when defining their own risk scoring algorithm. It includes a sample algorithm that organizations can implement or adapt based on their own needs, risk tolerance and priorities.

Generating the child labour risk score follows the model described for scoring the slavery and human trafficking risk.

Supplier Categorization

The child labour risk scoring methodology, described below, sorts suppliers into different categories, with the following interpretations.

Suppliers operating in a low-risk industry, low-risk geography with a low-risk workforce → low levels of inherent risk → **low-risk (low levels of inherent risk)**

Suppliers exposed to very high levels of inherent risk that cannot be mitigated through adequate risk controls → very high levels of inherent risk → **high-risk (high levels of inherent risk)**

Suppliers operating in a high-risk industry, high-risk geography, and/or with a high-risk workforce (high to moderate inherent risk) with policies, practices, and procedures in place that:

- adequately control risk → **low-risk (adequate risk control)**
- partially control risk → **medium-risk (partial risk control)**
- do not adequately control risk → **high-risk (inadequate risk control)**

Suppliers that have not provided the data needed to generate a child labour risk score → indeterminate

For ease of reference, please see the table below for an overview of these risk categories and their meaning:

		INHERENT RISK		
		Very high	High to Moderate	Low
Risk Control	Adequate	High-Risk (High Levels of Inherent Risk)	Low-Risk (Adequate Risk Control)	Low-Risk (Low Levels of Inherent Risk)
	Partial	High-Risk (High Levels of Inherent Risk)	Medium-Risk (Partial Risk Control)	Low-Risk (Low Levels of Inherent Risk)
	Inadequate	High-Risk (High Levels of Inherent Risk)	High-Risk (Inadequate Risk Control)	Low-Risk (Low Levels of Inherent Risk)

Risk Scoring Methodology

The methodology described below is a step-by-step categorization of suppliers in relation to the child labour risk categories described above.

Step 1: Is the supplier exposed to very high levels of inherent risk that cannot be mitigated through adequate risk controls?

STRT Questions 1 to 10: Screening and Prioritization evaluate risk inherent to a supplier’s geography, industry, and workforce. Some of these questions may relate to issues that present such a high level of inherent risk that the user may not want the supplier to be able to lower its risk through adequate risk controls. In these instances, the supplier is categorized as high-risk due to high levels of inherent risk. Otherwise, scoring advances to the next step.

Step 2: Has the supplier provided the data needed to generate a child labour risk status?

STRT question ‘topics scope’ within the Organization Information section of the template indicates the topics covered by the supplier’s Declaration. This selection impacts how a supplier responds to several questions in the STRT, such as questions 18, 23 and 24. If a supplier has selected “slavery and human trafficking” for ‘topics scope’, they are categorized as indeterminate because they have not provided the data needed to generate a child labour risk status. If a supplier has selected “child labour” OR “slavery, human trafficking and child labour”, scoring advances to the next step.

Step 3: Is the Supplier Operating in a Low-Risk Geography, Low-Risk Industry With a Low-Risk Workforce?

STRT Questions 1 to 10: Screening and Prioritization evaluate risk inherent to a supplier's geography, industry, and workforce. The cumulative score for these questions determines whether further investigation is needed to assess how well the supplier is managing the risk of child labour in its operations and supply chain. If a supplier's responses to Questions 1 to 10 fall below the assigned threshold, the supplier is categorized as low-risk due to its low inherent risk. If it exceeds the threshold, scoring advances to the next step.

Step 4: Is the Supplier Adequately Controlling for Risk?

Questions 11 to 28 in the STRT assess how well the supplier is controlling for risk. The cumulative score for these questions determines whether the supplier is adequately controlling for risk.

If a supplier's responses to Questions 11 to 28 fall below the assigned threshold, the supplier is categorized as low-risk due to the adequacy of its risk mitigation practices, policies, and procedures. If it exceeds the threshold, scoring advances to the next step.

You'll note that a supplier is only eligible for this low-risk category if it has strong policies, practices, and procedures in place to mitigate and prevent risk. The number of points acquired from Questions 1 through 10 is irrelevant to this calculation and is used instead to indicate that this calculation is needed due to the presence of inherent risk.

Users have the option of adding further nuance to their evaluations by assessing operational risk, supply chain risk, and labour supply chain risk separately. This would require an assessment of inherent risk across all three categories paired with an assessment of the strength of the suppliers' controls relevant to each.

Step 5: Is the Supplier Partially Controlling for Risk?

The cumulative score for Questions 1 to 28 in the STRT, which assesses both the supplier's inherent risk and risk management practices, determines whether the supplier is categorized as medium-risk or high-risk.

If a supplier's responses to Questions 1 to 28 exceed the number of points required to be categorized as a medium-risk supplier, the supplier is automatically categorized as high-risk; otherwise, it is medium-risk. This approach provides a holistic picture of a supplier's risk level by considering a supplier's risk exposure and the adequacy of its management practices *together*.

Risk Scoring Algorithm

A. SETTING THE THRESHOLD

The threshold between the different risk categories can be set high or low, depending on an organization's risk tolerance, prior actions, priorities, and other factors. When setting these thresholds, organizations should follow these guiding principles.

GUIDING PRINCIPLES FOR SETTING THE THRESHOLD

- **Trigger Questions:** Organizations can choose to designate one or more questions in the STRT as “trigger questions,” whereby a specific response to a “trigger question” disqualifies a supplier from a particular risk category. For example, if an organization sets the threshold for low-risk (low levels of inherent risk) at nine points and assigns 10 points to Question 1 (the “trigger question”), a single risk response for Question 1 would move the supplier out of the low-risk category. This strategy can, of course, be used on an aggregate level with more than one question.
- **Useful Spread:** Organizations can choose to adjust the threshold between medium and high-risk until they achieve a useful spread between the two risk categories. This way, organizations can identify a manageable number of high-risk suppliers to prioritize and target for their risk mitigation and prevention outreach efforts. Organizations are cautioned against using this principle for the two low-risk thresholds to preserve the meaning of these two categories.
- **Integrity of Supplier Categorizations:** When setting the threshold between the different risk categories, organizations should do so in a manner that ensures each supplier category retains its original meaning and/or is updated to reflect the new meaning. In other words, the threshold for the low-risk (low levels of inherent risk) category should be set in a way that only includes suppliers “operating in a low-risk geography, low-risk industry with a low-risk workforce,” or else it needs to be revised. Similarly, the threshold for the other low-risk category (adequate risk control) should be set in a way that only includes suppliers that “adequately control risk.” The medium-risk and high-risk categories allow for more subjective interpretation and, as a result, are more adaptable.

B. POINT ALLOCATION

The points assigned to various responses can be set high or low depending on an organization’s needs and priorities, including risks present in their sector. When defining point allocation, organizations should follow these guiding principles.

GUIDING PRINCIPLES FOR ALLOCATING POINTS

- **Missing Responses:** When a question requiring a response is left blank, the supplier should receive the higher risk score for the response.
- **Non-Congruence:** When a response is given that is incompatible with a response to another question, both responses should receive the higher-risk score.
- **Question Weighting:** Points are allocated based on the impact each question has on child labour risk. Some questions have no relevance to child labour risk, and instead relate to a separate risk scoring category, and should therefore be allocated zero points.
- **Supporting Documentation:** Points are deducted when adequate supporting documentation is not given. When possible, organizations should review supporting documentation to confirm its adequacy.

C. RISK SCORING ALGORITHMS: A SAMPLE APPROACH

The below identifies a possible approach to assigning points to questions in the STRT, as well as different thresholds for each risk category. An explanation and interpretation follow the tables. This sample risk scoring approach is not intended to be prescriptive, but rather to serve as an example for an organization when designing its own risk scoring algorithm.

Sample Approach

1. SCENARIO

Organization Beta operates in a sector where child labour risk is known to manifest itself among the organization's first-tier suppliers and beyond.

It is interested in gaining an understanding of its suppliers' vulnerability to child labour occurring in their operations and supply chain, so it has asked its suppliers to submit an STRT declaration that covers "child labour" (topics scope).

It wants suppliers that have workers or agents that are 14 years old and younger to be classified as high risk (high levels of inherent risk) to facilitate further due diligence and targeted follow-up action.

It bases its country risk ratings on the Children's Rights in the Workplace Index of the Children's Rights and Business Atlas by UNICEF and the Global Child Forum.

It is also concerned about the following high-risk goods in its supply chain: bananas, beef, broccoli, carrots, and cashews. It has asked its suppliers to submit an STRT declaration that covers these goods (goods scope). According to the US Department of Labor's Bureau of International Labor Affairs (ILAB) 2020 List of Goods Produced by Child Labor or Forced Labor and List of Products Produced by Forced or Indentured Child Labor, these goods are produced using child labor in the following countries/jurisdictions:

- Bananas: Belize, Brazil, Ecuador, Nicaragua, Philippines
- Beef: Brazil
- Broccoli: Guatemala
- Carrots: Paraguay
- Cashews: Brazil, Guinea, Vietnam

2. OVERVIEW

a. High-Risk (High Levels of Inherent Risk) Category

In this approach, suppliers that have selected "14 and younger" for Question 6 are categorized as high-risk (high level of inherent risk). Question 6 relates to the age of the organization's youngest worker or agent.

b. Indeterminate Category

If a supplier has selected "slavery and human trafficking" for 'topics scope', they are categorized as indeterminate because they have not provided the data needed to generate a child labour risk status. If a supplier has selected "child labour" OR "slavery, human trafficking and child labour", scoring advances to the next step.

c. Low-Risk (Low Levels of Inherent Risk) Category

In this approach, the threshold for a supplier to be considered low-risk is set below 2.5 points. Points for Questions 1, 2, 3, 6, and 7 are assigned in such a manner that a single answer of “Yes” to any one of them exceeds the number of points required to be categorized as a low-risk (low levels of inherent risk) supplier. This approach automatically places the supplier into the low-risk (adequate risk control), medium-risk, or high-risk category, based on how they score on the rest of the STRT. In this way, Questions 1, 2, 3, 6, and 7 are “trigger questions.”

As with the rest of the questions in the STRT, points for Questions 1 to 10 are allocated in a way that reflects the impact of each question on child labour risk. They are also allocated in a manner that gives similar weight to questions in the STRT relating to risk in a supplier’s operations and supply chain

d. Low-Risk (Adequate Risk Control) Category

The threshold for a supplier to be considered low-risk (adequate risk control) is set at nine points. Points for Questions 11 through 28 are assigned in such a manner that a single risk response (e.g., “No” response) to Questions 14 and 18 exceeds this threshold and automatically places the suppliers into the medium-risk or high-risk category, based on how they score on the rest of the STRT. In this way, Questions 14 and 18 are “trigger questions.” They move the supplier out of the low-risk (adequate risk mitigation) category when there is a single instance of a risk response.

As with the rest of the questions in the STRT, points for Questions 11 through 28 are allocated in a way that reflects the impact of each question on child labour risk. They are also allocated in a manner that gives similar weight to questions in the STRT relating to risk in a supplier’s operations and supply chain.

e. Medium & High-Risk Category

The threshold for a supplier to be considered medium-risk is set at 40 points. To ensure supply chain risk is adequately considered, points for Questions 1 to 28 are assigned in such a manner that a supplier with risk scores for every supply chain-related question (Questions 3, 4, 10, 14, 15, 16, 18B, 19, 20, 21, 23, 24, 25, 26, and 28) would exceed 40 points and be categorized as high-risk.

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
Goods scope 1	Bananas	0	Organization Beta is concerned about child labor risks in its banana supply chain
Goods scope 2	Beef	0	Organization Beta is concerned about child labor risks in its beef supply chain
Goods scope 3	Broccoli	0	Organization Beta is concerned about child labor risks in its broccoli supply chain
Goods scope 4	Carrots	0	Organization Beta is concerned about child labor risks in its carrot supply chain
Goods scope 5	Cashews	0	Organization Beta is concerned about child labor risks in its cashew supply chain

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
Goods scope 1	Bananas	0	Organization Beta is concerned about child labor risks in its banana supply chain
Goods scope 2	Beef	0	Organization Beta is concerned about child labor risks in its beef supply chain
Goods scope 3	Broccoli	0	Organization Beta is concerned about child labor risks in its broccoli supply chain
Goods scope 4	Carrots	0	Organization Beta is concerned about child labor risks in its carrot supply chain
Goods scope 5	Cashews	0	Organization Beta is concerned about child labor risks in its cashew supply chain
Topics scope	slavery and human trafficking	Indeterminate	Child labor is the focus of Organization Beta's due diligence efforts
	child labour	Eligible for all child labour risk statuses	
	slavery, human trafficking and child labour	Eligible for all child labour risk statuses	
	Blank	Indeterminate	
SCREENING AND PRIORITIZATION			
1	Selection that includes at least one high risk country	2.5	Points are based on the supplier's selection on the 'Countries' tab of the STRT. Organization Beta bases its country risk ratings on the Children's Rights and Business Atlas. Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category
	Selection that includes one or more medium risk countries and no high-risk countries	1.5	
	Selection that includes one or more low risk countries and no medium or high-risk countries	0	
	Blank	2.5	
2	Yes	2.5	Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category
	Blank	2.5	
	No	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
3 - bananas - "my organization produces this good in this source country"	Yes for "Belize", "Brazil", "Ecuador", "Nicaragua" and/or "Philippines"	2.5	<p>Bananas are produced using child labor in Belize, Brazil, Ecuador, Nicaragua and the Philippines according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using child labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as polysilicon, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "Belize", "Brazil", "Ecuador", "Nicaragua" and/or "Philippines"	0	
	No for "Belize", "Brazil", "Ecuador", "Nicaragua" and/or "Philippines"	0	
	N/A - my organization's products do not contain this good	0	
3 - bananas - "my organization sources (directly or indirectly) this good from this source country/ jurisdiction"	Yes for "Belize", "Brazil", "Ecuador", "Nicaragua" and/or "Philippines"	2.5	
	Blank for "Belize", "Brazil", "Ecuador", "Nicaragua" and/or "Philippines"	0	
	Unknown for "Belize", "Brazil", "Ecuador", "Nicaragua" and/or "Philippines"	2.5	
	No for "Belize", "Brazil", "Ecuador", "Nicaragua" and "Philippines"	0	
	N/A - my organization's products do not contain this good	0	
3 - beef - "my organization produces this good in this source country"	Yes for "Brazil"	2.5	
	Blank for "Brazil"	0	
	No for "Brazil"	0	
	N/A - my organization's products do not contain this good	0	
3 - beef - "my organization produces this good in this source country"	Yes for "Brazil"	2.5	
	Blank for "Brazil"	0	
	Unknown for "Brazil"	0	
	No for "Brazil"	0	
	N/A - my organization's products do not contain this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
3 - broccoli - "my organization produces this good in this source country"	Yes for "Guatemala"	2.5	<p>Broccoli is produced using child labor in Guatemala according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using child labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as polysilicon, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "Guatemala"	0	
	No for "Guatemala"	0	
	N/A - my organization's products do not contain this good	0	
3 - broccoli - "my organization sources (directly or indirectly) this good from this source country/ jurisdiction"	Yes for "Guatemala"	2.5	<p>Broccoli is produced using child labor in Guatemala according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using child labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as polysilicon, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "Guatemala"	0	
	Unknown for "Guatemala"	2.5	
	No for "Guatemala"	0	
	N/A - my organization's products do not contain this good	0	
3 - carrots - "my organization produces this good in this source country"	Yes for "Paraguay"	2.5	<p>Carrots are produced using child labor in Paraguay according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using child labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as polysilicon, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "Paraguay"	0	
	No for "Paraguay"	0	
	N/A - my organization's products do not contain this good	0	
3 - carrots - "my organization sources (directly or indirectly) this good from this source country/ jurisdiction"	Yes for "Paraguay"	2.5	<p>Carrots are produced using child labor in Paraguay according to the US Department of Labor's Bureau of International Labor Affairs (ILAB).</p> <p>If the supplier included a good in its declaration that is not known to be produced using child labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as polysilicon, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category</p>
	Blank for "Paraguay"	0	
	Unknown for "Paraguay"	2.5	
	No for "Paraguay"	0	
	N/A - my organization's products do not contain this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
3 - cashews - "my organization produces this good in this source country"	Yes for "Brazil", "Guinea" and/or "Vietnam"	2.5	Cashews are produced using child labor in Brazil, Guinea and Vietnam according to the US Department of Labor's Bureau of International Labor Affairs (ILAB). If the supplier included a good in its declaration that is not known to be produced using child labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as polysilicon, all question responses associated with this good would be allocated 0 points. Trigger question: Risk response automatically moves the supplier out of the "low-risk (low levels of inherent risk)" category
	Blank for "Brazil", "Guinea" and/or "Vietnam"	0	
	No for "Brazil", "Guinea" and "Vietnam"	0	
	N/A - my organization's products do not contain this good	0	
3 - cashews - "my organization sources (directly or indirectly) this good from this source country/ jurisdiction"	Yes for "Brazil", "Guinea" and/or "Vietnam"	2.5	
	Blank for "Brazil", "Guinea" and/or "Vietnam"	0	
	Unknown for "Brazil", "Guinea" and/or "Vietnam"	2.5	
	No for "Brazil", "Guinea" and "Vietnam"	0	
	N/A - my organization's products do not contain this good	0	
4 (bananas)	Yes	0	Organization Beta uses answers to this question to guide its corrective actions.
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
4 (beef)	Yes	0	Organization Beta uses answers to this question to guide its corrective actions.
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
4 (broccoli)	Yes	0	Organization Beta uses answers to this question to guide its corrective actions.
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
4 (carrots)	Yes	0	Organization Beta uses answers to this question to guide its corrective actions.
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
4 (cashews)	Yes	0	Organization Beta uses answers to this question to guide its corrective actions.
	Blank	0	
	No	0	
	Some	0	
	N/A - my organization does not source (directly or indirectly) this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
5	1-100	0	Organization Beta uses this question to take scale (number of impacted people) into account, which supports its prioritization efforts.
	101-1000	0	
	1001-2000	0	
	2001-5000	0	
	5001-10000	0	
	More than 10000	0	
	Blank	0	
6	14 and younger	2.5	Trigger question: "14 and younger" response automatically moves the supplier into the "high risk (high levels of inherent risk)" category
	15 to 18	1	
	older than 18	0	
	Blank	2.5	
7	Yes	2.5	Trigger question: Risk response automatically moves the supplier out of the "low risk (low levels of inherent risk)" category
	Blank	2.5	
	No	0	
8	Yes	2	
	No, our recruiters do not hire subcontractors to recruit workers	0	
	Blank	2	
	N/A - we do not use recruiters	0	
	We don't know if our recruiters hire subcontractors to recruit workers	2	
9	Yes	0	If Question 9 deactivated, score as Blank - 0
	Blank	0	
	No	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
10	Yes	0	Trigger question: "Yes" response automatically moves the supplier into the "high risk (high levels of inherent risk)" category If Question 10 deactivated score as Blank - 0
	Blank	0	
	No	0	
	Unknown	0	
	N/A - We do not work with suppliers	0	
Policy			
11a	No	0.5	
	Blank	0.5	
	Yes	0	
11b	No	0.5	
	Blank	0.5	
	Yes	0	
11c	No	0.5	
	Blank	0.5	
	Yes	0	
11d	No	2	
	Blank	2	
	Yes	0	
11e	No	2	
	Blank	2	
	Yes	0	
	N/A - We do not use recruiters	0	
11f	No	0.5	
	Blank	0.5	
	Yes	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
11g	No	2	Question relates to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	Blank	2	
	Yes	0	
11h	No	0	
	Blank	0	
	Yes, broadly and/or only when required by law or by contract	0	
12a	No	1.5	
	Blank	1.5	
	Yes	0	
12b	No	1	
	Blank	1	
	Yes	0	
	N/A - We do not provide or arrange housing	0	
12c	No	1.5	
	Blank	1.5	
	Yes	0	
12d	No	1	
	Blank	1	
	Yes	0	
12e	No	0.5	
	Blank	0.5	
	Yes	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
ORGANIZATION INFORMATION			
12f	No	1	
	Blank	1	
	Yes, but only when required by law or by contract	1	
	Yes, and this applies to all employees, even when not required by law or by contract	0	
12g	No	1.5	
	Blank	1.5	
	Yes, and this applies to all employees, even when not required by law or by contract	0	
13	No	1	
	Blank	1	
	Yes	0	
	N/A - we do not hire foreign or domestic migrant workers	0	
Supply Chain Management			
14	No	4.5	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category (as it would also warrant 4 points for Q10 + 1 point for Q11)
	Blank	4.5	
	Yes	0	
	N/A - we do not work with suppliers	0	
15	No	4	
	Blank	4	
	Yes	0	
	N/A - we do not work with suppliers	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
Supply Chain Management			
16	No	1	
	Blank	1	
	Yes	0	
	N/A - we do not work with suppliers	0	
Risk Identification and Management			
17	No	2.5	
	Blank	2.5	
	Yes	0	
	N/A - We do not use recruiters	0	
18a	No if Q6 is answered "15 to 18" or "14 and younger"	9.5	Trigger question: Risk response automatically moves the supplier out of the "low risk (adequate risk control)" category when young workers are used
	No if Q6 is answered "older than 18"	2.5	
	Blank if Q6 is answered "15 to 18" or "14 and younger"	9.5	
	Blank if Q6 is answered "older than 18"	2.5	
	Yes	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
18b (bananas)	No	1.25	<p>If the supplier included a good in its declaration that is not known to be produced using child labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB), such as polysilicon, all question responses associated with this good would be allocated 0 points.</p> <p>Trigger question: Risk response automatically moves the supplier out of the "low risk (adequate risk control)" category (as it would also warrant 2 points for Q19 and 2.5 points for Q21)</p>
	Blank	1.25	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
18b (beef)	No	1.25	
	Blank	0	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
18b (broccoli)	No	1.25	
	Blank	0	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
18b (carrots)	No	1.25	
	Blank	0	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	
18b (cashews)	No	1.25	
	Blank	0	
	Yes	0	
	N/A - my organization does not source (directly or indirectly) this good	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
18c	No	1.5	
	Blank	1.5	
	Yes	0	
	N/A - We do not use recruiters/ Our recruiters do not use sub-contractors	0	
19	No	2	
	Blank	2	
	Yes	0	
20	No	0.5	
	Blank	0.5	
	Yes	0	
21	100%	0	
	Greater than 90%	1	
	Greater than 75%	1.5	
	Greater than 50%	2	
	50% or less	2.5	
	Blank	2.5	
22	No	2.5	
	Yes	0	
	Blank	2.5	
Training			
23	No	5	
	Blank	5	
	Yes	0	
Reporting and Internal Accountability			
24	No	1.5	
	Blank	1.5	
	Yes	0	

STRT QUESTION	STRT QUESTION RESPONSE	POINTS	NOTES
25	No	1.5	
	Blank	1.5	
	Yes	0	
26	No	0.5	
	Blank	0.5	
	Yes	0	
Certification			
27	No	1	
	Blank	1	
	Yes	0	
	N/A - we do not use recruiters	0	
Public Disclosure			
28	Yes	0	Question relates to compliance with public disclosure regulations
	No	0	
	Blank	0	

PART 4: GENERATING A US FEDERAL ACQUISITION REGULATION FINAL RULE ON COMBATING TRAFFICKING IN PERSONS (52.222-50) COMPLIANCE STATUS

Introduction

Organizations can use data collected from their suppliers using the STRT to generate a US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50) compliance status (or “FAR compliance status” for short). This status is relevant for organizations subject to US FAR due to their role as contractors or subcontractors with the US federal government.

The following outlines different supplier categorizations as well as a risk scoring methodology and algorithm for generating the FAR compliance status.

Supplier Categorization

The methodology and algorithm described below for generating a FAR compliance status categorizes sup-

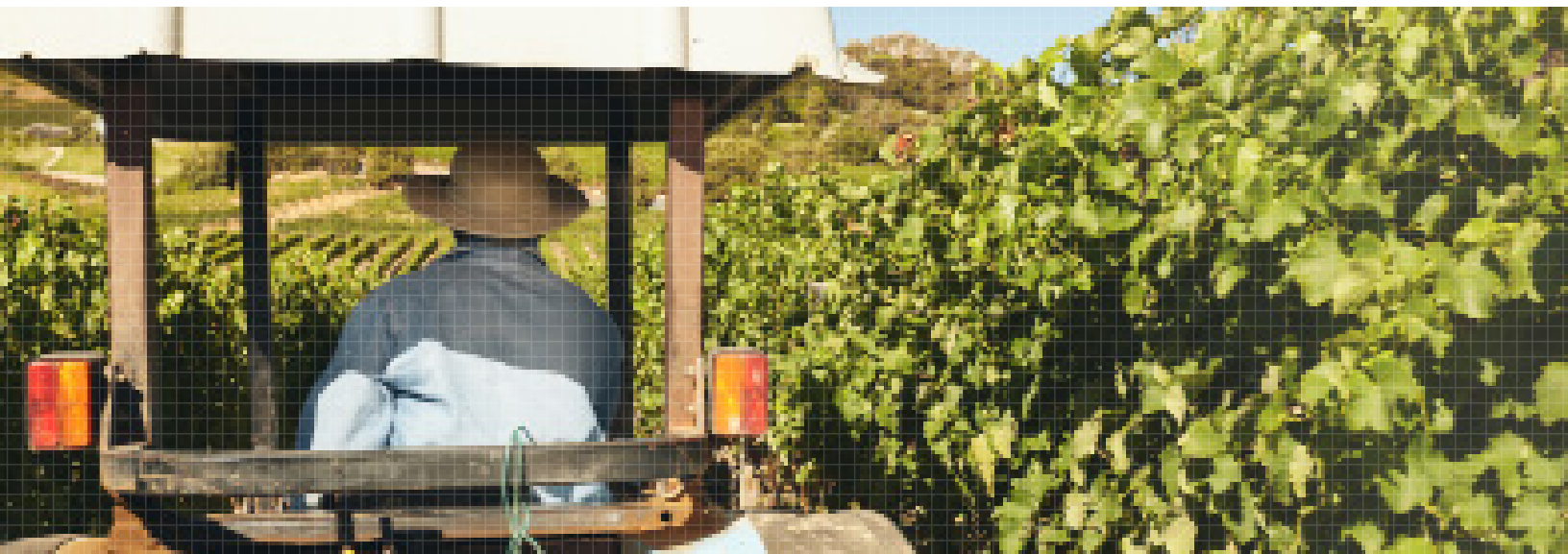
pliers into three different categories, with the following interpretations.

Suppliers indicating compliance with the US FAR Final Rule on Combating Trafficking in Persons (52.222-50)

→ **indication of compliance**

Suppliers indicating non-compliance with the US FAR Final Rule on Combating Trafficking in Persons (52.222-50) → **indication of non-compliance**

Suppliers where compliance with the US FAR Final Rule on Combating Trafficking in Persons (52.222-50) is unknown due to an incomplete STRT → **indeterminate**



This guide is careful in qualifying the US FAR compliance status as being an indication of compliance due to the imperfect overlap between the requirements of US FAR and questions in the STRT. Organizations are encouraged to conduct further investigation when a supplier indicates non-compliance with US FAR before determining follow-up action.

Compliance Status Methodology

The below presents a step-by-step methodology for categorizing suppliers into the three categories described above using the following principles as guidance. The next section provides a list of FAR-related STRT questions, along with FAR compliance responses.

GUIDING PRINCIPLES

- **Hierarchy of Statuses:** Statuses have the following hierarchy: indication of non-compliance → indeterminate → indication of compliance. Suppliers advance to the next status only when they are disqualified from the previous one. The implication of this approach is as follows: a blank response (or response with an absence of valid supporting documentation) to a FAR-related question in the STRT does not automatically qualify a supplier for indeterminate status. Instead, this status is only possible if the supplier is first disqualified from “indication of non-compliance.”
- **Binary:** A single occurrence of a specific value is sufficient to qualify a supplier for a specific status. In this way, a supplier with a single response indicating non-compliance with FAR is put into the same category as a supplier with 10 responses indicating non-compliance with FAR.

Step 1: Is the Supplier Indicating Non-Compliance with US FAR?

A supplier is categorized as indicating non-compliance with US FAR when there is one or more instance in which a FAR-related question in the STRT is given a response indicating non-compliance with FAR. The supplier must have selected “human trafficking and slavery” or “human trafficking, slavery and child labour” for the topics scope of its declaration to be eligible for this category. If no such instance occurs, the supplier advances to Step 2 in the risk scoring methodology.

Step 2: Is the Supplier Providing the Information Required to Indicate Compliance with US FAR?

A supplier is categorized as indeterminate when there is one or more instance in which a FAR-related question in the STRT is left blank (or valid supporting documentation is missing) and no instances in which a FAR-related question in the STRT is given a response indicating non-compliance with FAR. A supplier can also be categorized as indeterminate when it has selected “child labour” for the topics scope of its declaration because it has not provided the information needed to make a compliance determination. If neither occur, the supplier advances to the next step in the risk scoring methodology and is automatically categorized as indicating compliance with FAR.

Step 3: Is the Supplier Indicating Compliance With US FAR?

A supplier is categorized as indicating compliance with US FAR when it has advanced past Steps 1 and 2 and has provided a response indicating compliance with FAR in every FAR-related question in the STRT. The supplier must have selected “human trafficking and slavery” or “human trafficking, slavery and child labour” for the topics scope of its declaration to be eligible for this category.

Compliance Status Algorithm

The next section provides a list of FAR-related questions in the STRT, along with responses indicating US FAR compliance.

STRT QUESTION	RELEVANCE TO US FAR FINAL RULE ON COMBATING TRAFFICKING IN PERSONS (52.222-50)	STRT RESPONSE(S) INDICATING COMPLIANCE WITH US FAR
Goods scope	Not relevant	-
Topics scope	Human trafficking and slavery	Human trafficking and slavery’ or ‘human trafficking, slavery and child labour’ must be selected by the supplier
1	Not relevant	-
2	Not relevant	-
3	Not relevant	-
4	Not relevant	-
5	Not relevant	-
6	Not relevant	-
7	Not relevant	-
8	Not relevant	-
9	Not relevant	-
10	Not relevant	-
11a	Relevant (Source: 48 Code of Federal Regulations 22.1703 (a)(1) and (3))	Yes (with supporting documentation)
11b	Not relevant	-
11c	Not relevant	-
11d	Relevant (Source: 48 CFR 22.1703 (a)(4))	Yes (with supporting documentation)
11e	Relevant (Source: 48 CFR 22.1703 (a)(5ii))	- Yes (with supporting documentation) - N/A — We do not use recruiters
11f	Not relevant	-

STRT QUESTION	RELEVANCE TO US FAR FINAL RULE ON COMBATING TRAFFICKING IN PERSONS (52.222-50)	STRT RESPONSE(S) INDICATING COMPLIANCE WITH US FAR
11g	Relevant (Source: 48 CFR 22.1703 (a)(6))	Yes (with supporting documentation)
11h	Relevant (Source: 48 CFR 22.1703 (a)(2))	Yes, broadly and/or only when required by law or by contract (with supporting documentation)
12a	Relevant (Source: 48 CFR 22.1703 (a)(7))	- Yes (with supporting documentation) - N/A – N/A - We do not hire foreign migrant workers
12b	Relevant (Source: 48 CFR 22.1703 (a)(8))	- Yes (with supporting documentation) - N/A – We do not provide or arrange housing
12c	Not relevant	-
12d	Relevant (Source: 48 CFR 52.222-50 (h))	Yes (with supporting documentation)
12e	Not relevant	-
12f	Relevant (Source: 48 CFR 22.1703 (a)(9))	- Yes, but only when required by law or by contract (with supporting documentation) - Yes, and this applies to all employees, even when not required by law or by contract (with supporting documentation)
12g	Not relevant	-
13	Not relevant	-
14	Relevant (Source: 48 CFR 52.222-50 (i))	- Yes (with supporting documentation) - N/A – We do not work with any suppliers
15	Relevant (Source: 48 CFR 52.222-50 (i))	- Yes (with supporting documentation) - N/A – We do not work with any suppliers
16	Relevant (Source: 48 CFR 52.222-50 (i))	- Yes (with supporting documentation) - N/A – We do not work with any suppliers
17	Not relevant	-
18a	No relevant	-
18b	Relevant when the good(s) is known to be produced using forced labor according to the US Department of Labor's Bureau of International Labor Affairs (ILAB) (Source: 48 CFR 52.222-50 (h))	- Yes (with supporting documentation) - N/A – my organization does not source (directly or indirectly) this good
18c	Not relevant	-
19	Relevant (Source: 48 CFR 52.222-50 (h))	Yes (with supporting documentation)
20	Not relevant	-

STRT QUESTION	RELEVANCE TO US FAR FINAL RULE ON COMBATING TRAFFICKING IN PERSONS (52.222-50)	STRT RESPONSE(S) INDICATING COMPLIANCE WITH US FAR
21	Not relevant	-
22	Not relevant	-
23	Not relevant	-
24	Relevant (Source: 48 CFR 52.222-50 (h))	Yes (with supporting documentation)
25	Relevant (Source: 48 CFR 52.222-50 (c))	Yes (with supporting documentation)
26	Not relevant	-
27	Not relevant	-
28	Not relevant	-

PART 5: GENERATING A UYGHUR FORCED LABOR PREVENTION ACT COMPLIANCE STATUS

Introduction

Organizations can use data acquired with the STRT to generate a Uyghur Forced Labor Prevention Act (UFLPA) compliance status. This status is relevant for companies importing goods into the United States.

The below outlines different supplier categorizations as well as a risk scoring methodology and algorithm for generating the compliance status.



The compliance status does not fully take into account a suppliers' internal controls and, as such, is designed to be calculated alongside the human trafficking and slavery risk score to provide an assessment of forced labour risk. Rather it is designed to assess a suppliers' links to labor from the Xinjiang Uyghur Autonomous Region (XUAR) of China and uses this finding as a proxy for compliance with the UFLPA. calculated alongside the human trafficking and slavery risk score to provide an assessment of forced labour risk. Rather it is designed to assess a suppliers' links to labor from the Xinjiang Uyghur Autonomous Region (XUAR) of China and uses this finding as a proxy for compliance with the UFLPA.

Supplier Categorization

The methodology and algorithm described below for generating a compliance status for the Uyghur Forced Labor Prevention Act categorizes suppliers into four different categories, with the following interpretations.

- Suppliers with confirmed links to XUAR labor through their operations and/or supply chain → **confirmed** links
- Suppliers at high-risk of links to XUAR labor through their operations and/or supply chain → **high-risk**
- Suppliers at medium-risk of links to XUAR labor through their operations and/or supply chain → **medium-risk**
- Suppliers at low-risk of links to XUAR labor through their operations and/or supply chain → **low-risk**

COMPLIANCE STATUS METHODOLOGY

The methodology for categorizing suppliers into the four categories described above is as follows. Suppliers advance to the next status only when they are disqualified from the previous one. When a question requiring a response is left blank, the supplier should receive the higher risk score for the response.

Step 1: Does the supplier have confirmed links to XUAR labor?

Suppliers are categorized as having confirmed links to XUAR labor if they respond "Yes" to Question 9 and/or Question 10. If not, the supplier advances to the next step in the scoring methodology.

Step 2: Is the supplier at high risk for links to XUAR labor?

Suppliers are categorized as being at high-risk for links to XUAR labor if - according to their response to Question 3 - they produce/source (or may produce/source) goods in CHINA that are known to be produced using forced labor in XUAR according to the Uyghur Forced Labor Prevention Act and US Department of Labor's Bureau of International Labor Affairs (ILAB) 2020 List of Goods Produced by Child Labor or Forced Labor. At the time of writing, these goods are:

1. Polysilicon
2. Electronics
3. Footwear
4. Garments
5. Gloves
6. Hair Products
7. Textiles
8. Thread/Yarn
9. Tomato Products
10. Cotton

Suppliers can also be categorized as being at high-risk for links to XUAR labor if they do not have visibility into their supply chain links to XUAR.

Specifically, suppliers are eligible for this category if they answer “Yes” and/or “Unknown” for CHINA to Question 3 for the goods listed above. They are also eligible for this category if they answer “Unknown” to Question 10.

Suppliers can also be categorized as being at high-risk for links to XUAR labor if they source one or more of the goods listed above and do not have full visibility into their supply chain because less than 100% of their relevant suppliers have provided a response to their due diligence survey (Question 21). Otherwise, the supplier advances to the next step in the scoring methodology.

Step 3: Is the supplier at medium risk for links to XUAR labor?

Suppliers are categorized as being at medium-risk for links to XUAR labor if they selected “China” on the **Countries** tab. They are also categorized as being medium-risk for links to XUAR labor if they source, or may source, goods from China (Question 3).

Step 4: Is the supplier at low risk for links to XUAR labor?

Suppliers are categorized as being at low-risk for links to XUAR labor if they don’t satisfy the above conditions.

PART 6: GENERATING A TITLE III COUNTERING AMERICA'S ADVERSARIES THROUGH SANCTIONS ACT COMPLIANCE STATUS

Introduction

Organizations can use data acquired using the STRT to generate a Title III Countering America's Adversaries Through Sanctions Act (CAATSA) compliance status. This status is relevant for organizations importing goods, wares, merchandise, and articles into the US.



The below outlines different supplier categorizations as well as a risk scoring methodology and algorithm for generating the Title III CAATSA compliance status. This guide is careful in qualifying the Title III CAATSA compliance status as being an indication of compliance due to deceptive practices employed by North Korea to evade sanctions and other factors. Organizations must accompany the STRT with effective due diligence policies, procedures, and internal controls to ensure compliance with Title III of CAATSA.

Supplier Categorization

The methodology and algorithm described below for generating a CAATSA compliance status categorizes suppliers into different categories, with the following interpretations.

- Suppliers with confirmed links to North Korean labor through their operations and/or supply chain → **confirmed links**
- Suppliers at high-risk of links to North Korean labor through their operations and/or supply chain → **high-risk**
- Suppliers at medium-risk of links to North Korean labor through their operations and/or supply chain → **medium-risk**
- Suppliers at low-risk of links to North Korean labor through their operations and/or supply chain → **low-risk**

COMPLIANCE STATUS METHODOLOGY

The methodology for categorizing suppliers into the four categories described above is as follows. Suppliers advance to the next status only when they are disqualified from the previous one. When a question requiring a response is left blank, the supplier should receive the higher risk score for the response.

Step 1: Does the supplier have confirmed links to North Korean labor?

Suppliers are categorized as having confirmed links to North Korean labor if they select “Korea, North” in the Countries tab in response to Question 1. They can also be categorized as having confirmed links to North Korean labor if - according to their response to Question 3 - they produce or source goods from NORTH KOREA. If not, the supplier advances to the next step in the scoring methodology.

Step 2: Is the supplier at high risk for links to North Korean labor?

Suppliers are categorized as being at high-risk for links to North Korean labor if - according to their response to Question 3 - they may source goods from NORTH KOREA. Specifically, suppliers are eligible for this category if they answer “Unknown” for NORTH KOREA to Question 3 “My organization sources (directly or indirectly) this good from this source country/jurisdiction.”

Step 3: Is the supplier at medium risk for links to North Korean labor?

Suppliers are categorized as being at medium-risk for links to North Korean labor if they source one or more of the goods that are listed below and do not have full visibility into their supply chain because less than 100% of their relevant suppliers have provided a response to their due diligence survey (Question 21).

The following goods are known to be produced using forced labor in North Korean according to the US Department of Labor’s Bureau of International Labor Affairs (ILAB) 2020 List of Goods Produced by Child Labor or Forced Labor. At the time of writing, these goods are:

1. Bricks
2. Cement
3. Coal
4. Iron
5. Textiles
6. Gold
7. Timber

Step 4: Is the supplier at low risk for links to North Korean labor?

Suppliers are categorized as being at low-risk for links to North Korean labor if they don't satisfy the above conditions.

PART 7: GENERATING A CODE OF CONDUCT COMPLIANCE STATUS

Though not the original intent of the STRT, organizations can use data acquired with the standard to generate a code of conduct compliance status. This requires organizations to first map the questions in the STRT with provisions in their own supplier code of conduct. Organizations can then follow a similar methodology and algorithm to the above to generate a compliance status.

Given the likelihood of imperfect overlap between STRT questions and an organization's code of conduct, the code of conduct compliance status will likely need to be qualified as an indication of compliance. Organizations are then encouraged to conduct further investigation when a supplier indicates non-compliance with their code of conduct before determining follow-up risk mitigation and prevention action.





SCORING GUIDE

SLAVERY & TRAFFICKING RISK TEMPLATE (STRT) VERSION 3.2