STRT

SUPPLIER USER GUIDE

THE INDUSTRY STANDARD TEMPLATE

SRA

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Introduction

The Slavery & Trafficking Risk Template (STRT) is a standardized open-source template you can use to **share slavery-, human trafficking-, and child labour-related risk and compliance data** with your customers.

The STRT empowers you to disclose information to your customers that will assist them in their efforts to strengthen their compliance programs in the fight against human trafficking, slavery, and child labour. Once you've shared this information with your customers, they can then prioritize and implement risk mitigation actions with the goal of fortifying their organization as well as yours against illegal and unethical practices.

How It Works

The STRT is an interactive document. Each question is structured to gain specific information related to human trafficking, slavery, child labour and compliance risk. The template records the answer to each question, then runs logic algorithms to check the data's accuracy and validity.

Once the template is completed with valid information, you should submit it, along with any supporting documentation, to your customers upon their request. The data gathered helps your customers to implement human trafficking-related risk mitigations actions.

Why Am I Being Asked to Complete the STRT?

You have been asked to complete the STRT because one or more of your customers is collecting data from their supply chain on high-level indicators of human trafficking as well as indicators of compliance with human trafficking, slavery, and child labour legislation. You may be completing the STRT as part of your own internal efforts to gauge your organization's risk level as it relates to human trafficking, slavery, and child labour.

If your customer, or customers, have requested that you submit the STRT, this does **not** mean that you are suspected of using trafficked, forced, or child labour. It simply means that your customer, or your customers, is seeking to better understand risk in their supply chain for the purpose of mitigating or preventing this risk.

Filling Out the STRT: A Step-by-Step Guide

The STRT is separated into seven sections organized on individual tabs. These tabs are:

- Introduction
- Declaration
- Countries
- Sectors
- Source Countries
- Review
- Glossary

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

Introduction

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

Refer to this tab at any time for clarification on the purpose of the STRT or any tabs it contains.

Declaration

The **Declaration** tab represents the bulk of the STRT. In this section, you respond to a series of questions designed to assess risks of slavery, human trafficking, and child labour and non-compliance with human trafficking, slavery, and child labour regulations.

The **Declaration** tab is separated into several categories. Each category contains questions pertaining to specific slavery-, human trafficking-, and child labour-related topics.

The STRT is available in English, French, Spanish, German, Chinese, Japanese and Portuguese. You select your preferred language from the drop-down box at the top of the **Declaration** tab. Once a language is selected, the STRT automatically translates.

VERSION

This section identifies the STRT version. Always use the most recent version of the STRT, as listed on the **http://www.sraglobal.org** website. This field is auto-populated by the STRT and is for reference and version control only.

ORGANIZATION INFORMATION

All fields in yellow require a response and **must** be completed to submit a valid STRT, unless otherwise noted.

Grey fields do not require a response.

Organization Name

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

The Data Universal Number System (DUNS) number is a unique numeric identifier, issued by Dun & Bradstreet, assigned to your business to establish a business credit file. Note a DUNS number is not required to successfully complete this section of the STRT.

A Value Added Tax (VAT) identification number is a unique identifier used for value added tax purposes in certain countries. Note a VAT number is not required to successfully complete this section of the STRT.

Organization's Unique Identifier Number or Code (Optional)

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

Organization Address (Optional)

Input your organization's mailing address. If your organization operates in more than one location, input the head office's information.

Contact Person Full Name

List the full name of the primary contact person for any communications regarding the information provided within the STRT.

Contact Email

List the contact person's email address.

Contact Phone Number

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

Authorizing Person's Full Name

List the full name of the person authorized to declare the contents of this survey as true and accurate to the best of his/her knowledge. The authorizing person may be different than the contact person.

Authorizer Title

Enter the authorizing person's title within the organization.

Authorizer Email

List the authorizing person's email address.

Authorizer Phone Number

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

Date of Completion

Enter the date upon which the survey was completed. Dates should be formatted YYYY/MM/DD.

Goods of Portential Concern (1-5)

The Goods of Portential Concern identifies the goods included in the Declaration. This section links all the questions to do with the goods covered in the Declaration. Your Goods of Portential Concern is likely provided by your customer and will be based on the goods directly affected by the Declaration. Your customer may have made this selection based on the most prevalent high-risk goods in their supply chain and/or the focus of their traceability efforts.

You can include up to 5 goods. For more than five goods, please disclose using a second STRT. Service providers can select N/A for this section of the Declaration. Suppliers can choose N/A for this part of the declaration if their component of the supply change does not include one or more of the goods listed.

Select the sector and goods you are including in this report. All goods selected populate the rows under questions 3 and 4. When you've selected the sector, the selection list of goods is automatically filled with the goods for that sector. When selected, the goods appear as entries for questions 3, 4, and 18.b.

Topics Scope

The 'topics scope' identifies the topics covered by your declaration. This could be human trafficking and slavery only, child labor only or both. The 'topics scope' is normally defined for you by your customer. Your customer may have made this selection based on the focus of its compliance program. Select the scope from the drop-down menu.

Regulatory Scope

The 'regulatory scope' identifies whether all applicable regulations are covered by this declaration. This selection activates or deactivates questions 9 and 10 in the STRT. The 'regulatory scope' is normally defined for you by your customer. Your customer may have made this selection based on the focus of its compliance program.

Questions

Each question on the **Declaration** tab uses several columns to collect responses to the questions and, if applicable, any supporting documentation. An explanation of each of these columns is provided below.

Note that supporting documentation fields may change from grey (not required) to yellow (required) fields de-

pending on the answer provided in the **Response** column.

Question

This column on the **Declaration** tab indicates the question number and is used to quickly reference specific questions within the STRT. This is for reference only and requires no input from you.

Sub-Question

In cases where a question has several parts, this column on the **Declaration** tab indicates the corresponding sub-question number. It is used to quickly reference specific sub-questions within the STRT. This is for reference only and requires no input from you.

Question

This column on the **Declaration** tab contains the question requiring a response.

Question Response

Enter your response to the corresponding question in the **Response** column on the **Declaration** tab. Each question requires, at minimum, a 'Yes' or 'No' answer. Some questions have other options with a set of relevant answers in a drop-down list. You can use the drop-down arrow in the bottom right corner of the response field to select your answer. Unless otherwise specified, 'Yes' or 'No' are the only acceptable responses. Typing any other response results in an error message.

Supporting Documentation Required

The **Supporting Documentation Required** column on the **Declaration** tab automatically changes from grey to white with red text if you are required to submit documentation supporting your answer to the question.

Red text names the specific type of documentation required. If the column remains grey after the response has been entered, the field is not required.

URL or File

When supporting documentation is required, use the **URL or File** entry to include a link to the documentation online or as a digital file.

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

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

Comments

If you would like to provide additional comments in your responses, use the **Comments** column for the appropriate field(s) on the **Declaration** tab.

SCREENING & PRIORITIZATION

Question 1: Where does your organization have operations? Select all applicable countries/jurisdictions on the Countries tab.

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

If your organization has operations in any of the countries/jurisdictions listed on the **Countries** tab, select 'Yes' next to any country/jurisdiction within which your organization operates.

The countries listed on the **Countries** tab are Tier 2, Tier 2 Watchlist, Tier 3, Special Cases, and countries known to host or have hosted North Korean labourers according to the US Department of State's Trafficking in Persons Report (updated annually).

Question 2: *Does your organization have operations in any of the sectors listed on the Sectors tab. If yes, select all sectors that apply on the Sectors tab.*

Prior to answering this question, refer to the **Glossary** tab for the definitions for 'organization' and 'operation.' The **Glossary** tab includes a definition for each sector.

If your organization has operations in any the sectors listed on the **Sectors** tab, select or type 'Yes' in the corresponding **Selection** field. If you do not operate in any of the sectors listed on the **Sectors** tab, select or type 'No' in the **Sectors** tab **Selection** field. The information is automatically entered in the **Declaration** tab.

Question 3: *Does your organization produce and/or source (directly or indirectly) the good(s) covered by this Declaration in any of the source countries listed in the Source Countries tab? Using the list on the Source Countries tab, select all countries that apply.*

Refer to the **Glossary** tab for the definitions for 'organization.'

Your answers to the Goods of Portential Concern question automatically populate the first column of this question and highlight the goods in the **Source Countries** tab. For each of the goods highlighted, choose the country/jurisdiction where the goods are produced or sourced by or for your organization.

Question 4: *Does your organization have a direct relationship with the supplier(s) mining, growing, or manufacturing the good(s) covered by this Declaration?*

Your answers to the Goods of Portential Concern ques-

tion automatically populate the first column of this question. For each of the goods selected, identify your organization's relationship to the product supplier(s).

Question 5: *How many workers and agents does your organization employ?*

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

This question requires you to identify the numbers of workers and agents employed within your organization and indicate it in the corresponding **Response** field on the **Declaration** tab.

Question 6: *What is the age of your youngest worker or agent?*

Select the age range for the youngest worker or agent associated with your organization.

Question 7: *Does your organization employ or hire low-skilled foreign or domestic migrant workers (directly or through recruiters)?*

Prior to answering this question, refer to the **Glossary** tab for the definitions of 'organization', 'low-skilled work', 'migrant worker', and 'recruiter.'

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

field.

Question 8: *Does your organization use recruiters who hire subcontractors to recruit workers?*

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

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

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

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

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

Question 9: *Do any of the goods, wares, articles, or merchandise that your organization produces, manufactures, or mines originate wholly or in part in the Xinjiang Uyghur Autonomous Region of China, or by persons working with the Xinjiang Uyghur Autonomous Region government for purposes of the "poverty alleviation" program or the "pairing-assistance" program which subsidizes the establishment of manufacturing facilities in the Xinjiang Uyghur Autonomous Region?*

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

If you have goods, wares, articles, or merchandise that your organization produces, manufactures, or mines wholly or in part in the Xinjiang Uyghur Autonomous Region of China, select 'Yes' in the corresponding **Response**

field on the **Declaration** tab. If you do not, select 'No' in the **Response** field.

Question 10: *Do any of your suppliers produce, manufacture, or mine goods, wares, articles, or merchandise that originate wholly or in part in the Xinjiang Uyghur Autonomous Region of China, or by persons working with the Xinjiang Uyghur Autonomous Region government for purposes of the "poverty alleviation" program or the "pairing-assistance" program which subsidizes the establishment of manufacturing facilities in the Xinjiang Uyghur Autonomous Region?*

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

If you have goods, wares, articles, or merchandise that your suppliers produce, manufacture, or mine that originate wholly or in part in the Xinjiang Uyghur Autonomous Region of China, select 'Yes' in the corresponding **Response** field on the **Declaration** tab. If you do not, select 'No' in the **Response** field. Alternatively, if you do know the status of the source for the goods, select 'Unknown' and if your organization does not work with suppliers, select 'N/A – We do not work with any suppliers.'

POLICY

Question 11: *Does your organization issue a policy or policies prohibiting workers and agents from the following:*

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

    a)   Engaging in all forms of forced labour and

human trafficking (also referred to as modern slavery)?

Prior to answering this sub-question, refer to the **Glossary** tab for the definitions of 'human trafficking' and 'forced labour.'

If your organization issues and enforces a policy or policies prohibiting workers and agents from engaging in all forms of human trafficking and forced labour, select 'Yes' in the **Response** field. If not, select 'No'.

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

b) Engaging in the worst forms of child labour? The worst forms of child labour include hazardous child labour, which is work performed by a person under the age of 18 that jeopardizes their physical, mental, or moral well-being. It includes work that takes place under particularly difficult conditions such as work for long hours or during the night.

Prior to answer this sub-question, refer to the **Glossary** tab for the definition of 'child labour.'

If your organization issues and enforces a policy or policies prohibiting workers and agents from engaging in all forms of child labour, select 'Yes' in the **Response** field. If not, select 'No.'

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into

the **Insert URL to relevant document(s) or corresponding file name(s)** field of the Declaration tab.

c) Engaging in child labour? Child labour constitutes work performed by a person under the age for completing compulsory schooling, and, in general, not less than 15 years.

Prior to answer this sub-question, refer to the **Glossary** tab for the definition of 'child labour.'

If your organization issues and enforces a policy or policies prohibiting workers and agents from engaging in all forms of child labour, select 'Yes' in the **Response** field. If not, select 'No.'

If 'Yes' the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the Insert URL to relevant document(s) or corresponding file name(s) field of the **Declaration** tab.

d) Withholding worker identity or immigration documents?

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

If your organization has a policy in place prohibiting workers and agents from withholding employee identity or immigration documents, select or type 'Yes' in the **Response** field. If not, select or type 'No.'

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

e) Using recruiters that do not comply with local labour laws of the country in which the recruit-

ing takes place?

Prior to answering this sub-question, refer to the **Glossary** tab for the definition of 'recruiter.'

If your organization has a policy in place prohibiting the use of recruiters that do not comply with the local labour laws of the country in which the recruiting takes place, select or type 'Yes' in the **Response** field. If not, select or type 'No.' If your organization does not use recruiters, select the 'N/A — We do not use recruiters' option from the dropdown list.

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

f) Discrimination before hiring, on the job, or upon leaving based on race and/or colour, sex, religion, political opinion, national extraction, age, HIV/AIDS status, disability, nationality, or trade union membership or activities.

If your organization issues and enforces a policy or policies that prohibit discrimination, select 'Yes' in the **Response** field. If not, select 'No.'

If 'Yes,' the **Supporting Documentation Required** column indicates 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop-down in the **URL or File** field. Add the URL or corresponding file name(s) in the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declarations** tab.

g) Charging workers or potential workers recruitment fees, according to the definition provided in the Glossary? Please note: You must read the definition of recruitment fees to accurately answer this question.

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

If your organization issues and enforces a policy or policies prohibiting workers and agents from charging workers recruitment fees, according to the definition provided in the **Glossary** tab, answer this question by selecting or typing 'Yes' in the **Response** field. If not, select or type 'No.'

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

h) Procuring commercial sex acts during the length of the contract?

Prior to answering this sub-question, refer to the **Glossary** tab for the definition of 'commercial sex act.'

If your organization issues and enforces a policy or policies prohibiting the procurement of commercial sex acts during the length of the contract, select or type the option 'Yes, broadly and/or only when required by law or contract' in the **Response** field. If not, select or type 'No.'

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 12: *Does your organization issue a policy or policies explicitly ensuring the following?*

a) The provision or payment of return transportation for all foreign migrant workers at the end of their period of work if they were brought to the country for the purpose of working for your organization (directly or through recruiters) unless they fall under the exceptions outlined in the **Glossary** under 'Return Transportation'?

Prior to answering this sub-question, refer to the definitions of 'organization', 'policy', 'worker', 'migrant worker', 'recruiter', and 'return transportation' in the **Glossary** tab.

If your organization issues and enforces a policy or policies ensuring the provision or payment of return transportation for all foreign migrant workers at the end of their period of work, if they were brought to the country for the purpose of working for your organization, select or type 'Yes' in the **Response** field. If your organization has no such policy, or the worker(s) fall under the exceptions outlined in the **Glossary** under 'return transportation', select or type 'No.' If your organization does not hire foreign migrant workers, select the 'N/A - We do not hire foreign migrant workers' option from the dropdown list.

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the URL or File field. Add the URL or corresponding file name(s) into the Insert URL to relevant document(s) or corresponding file name(s) field of the **Declaration** tab.

b) Housing provided or arranged for your workers meets host-country housing and safety standards?

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

If your organization issues and enforces a policy or policies ensuring the housing provided or arranged for your organization meets host-country housing and safety standards, select or type 'Yes' in the **Response** field. If

you do not have such policies in place, select or type 'No.' If your organization does not provide or arrange housing, select the 'N/A — We do not provide or arrange housing' option from the dropdown list.

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

c) Workers, including migrant workers, can cancel their work contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with local law or a collective agreement?

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

If your organization has a policy or policies in place ensuring migrant workers can cancel their work contracts with no financial penalty before they relocate for work, select or type 'Yes' in the **Response** field. If not, select or type 'No.'

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

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

If your organization has a policy or policies in place to ensure wages meet applicable host country legal requirements or, if there is no legal minimum wage, wages are aligned with the prevailing sector wage, select or type

'Yes' in the **Response** field. If your organization has no such policy in place, select or type 'No.'

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the URL or File field. Add the URL or corresponding file name(s) into the Insert URL to relevant document(s) or corresponding file name(s) field of the Declaration tab.

e) Workers have the right to form and join trade unions of their own choosing, to bargain collectively, and engage in peaceful assembly in conformance with local law?

If your organization has a policy or policies in place to ensure workers have the right to organize, bargain collectively, and congregate peacefully, select 'Yes' in the Response field. If your organization has no such policy in place, select 'No.'

If 'Yes,' the Supporting Documentation Required column indicates, in red, 'Policy Required.' Choose either the 'URL' or 'File' option from the drop-down menu in the URL or File field. Add the URL or file name(s) in the Insert URL to relevant document(s) or corresponding file name(s) field of the Declarations tab.

f) Workers, including those hired by recruiters, are given detailed and accurate work agreements or similar work papers (prior to relocation if relocation is required) in a language understood by the worker?

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

If your organization has a policy or policies in place ensuring all workers, including those hired by recruiters, are provided with detailed and accurate work agreements or similar work papers, prior to relocation in cases where

the worker must relocate to perform the work, and in a language understood by the worker, select or type 'Yes, and this applies to all workers whether required by law or by contract', or 'Yes, but only when required by law or by contract' in the **Response** field. If your organization does not have such a policy in place, select or type 'No.'

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

e) Document checks (including proof of age documents) of all workers before they begin working to confirm they are allowed to work according to legal standards and applicable organization policies?

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

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

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 13: *Does your organization issue a policy or policies regulating the use of foreign or domestic migrant workers?*

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

If your organization has a policy or policies regulating the use of foreign or domestic migrant workers, select 'Yes' in the **Response** field. If your organization has no such policy, select 'No.' If your organization does not work with suppliers, select the 'N/A — We do not hire and foreign or domestic migrant workers' option from the drop-down list.

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

SUPPLY CHAIN MANAGEMENT

Question 14: *Does your organization issue a policy or policies to its suppliers covering the provisions you selected in Questions 10, 11, and 12?*

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

If your suppliers are required to comply with your policies listed in Questions 10 and 11, select or type 'Yes' in the **Response** field. If your suppliers are not required to comply, select or type 'No.' If your organization does not work with suppliers, select the 'N/A — We do not work with any suppliers' option from the drop-down list.

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop-down in the **URL or**

File field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 15: *If you answered 'Yes' to Question 14, does your organization have contractual terms and conditions that require its suppliers to affirmatively agree to its policy or policies (or equivalent)?*

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

If you answered 'Yes' to Question 14 and your organization does have contractual terms and conditions that require your suppliers to affirmatively agree to your policy or policies (or equivalent), select 'Yes' in the **Response** field. If you answered 'Yes' to Question 14 and your organization does **not** have contractual terms and conditions that require your suppliers to affirmatively agree to your policy or policies (or equivalent), select 'No.' If your organization does not work with suppliers, select the 'N/A — We do not work with any suppliers' option from the drop-down list.

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop-down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 16: *If you answered 'Yes' to Question 14 and/or 15, does your organization's policy or policies (or the equivalent) and/or contractual terms and conditions include a flow-down clause?*

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

If you answered 'Yes' to Question 14 and/or 15 and your organization's policy or policies (or the equivalent) and/or contractual terms and conditions does include a flow-

down clause, select 'Yes' in the **Response** field.

If you answered 'Yes' to Question 14 and/or 15 and your organization's policy or policies (or the equivalent) and/or contractual terms and conditions does **not** include a flow-down clause, select or type 'No.'

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

If 'Yes', the **Supporting Documentation Required** column will indicate 'Policy Required' in red. Choose the 'URL' or 'File' option from the drop-down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

RISK INDENTIFICATION & MANAGEMENT

Question 17: Does your organization perform formal screening and evaluation of prospective recruiters to determine if they (i) operate in compliance with the law and applicable organization policies, and (ii) observe the 'employers pay' principle of not charging any recruitment fees to workers, as defined in the** Glossary**?

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

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

If 'Yes', the **Supporting Documentation Required** column updates to show 'Proof of screening and evaluation

of prospective recruiters required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 18: Does your organization identify and assess risks on the topic(s) covered by this Declaration on an ongoing basis, taking into account risks arising from particular operating contexts in:

    a)   Your operations.

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

With regards to your organization's direct operations, if your organization works, in an ongoing fashion, to identify and mitigate the risks identified in this Declaration, select 'Yes.' If your organization does not have an on-going review and mitigation process, select 'No.'

If 'Yes,' the Supporting Documentation Required column updates, in red, to 'Proof of Risk Assessment Required.' Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

    b)   Your supply chain for the good(s) covered by this Declaration?

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

'supply chain.'

With regards to your organization's supply chain for the good(s) covered in this Declaration, if your organization works, in an ongoing fashion, to identify and mitigate the risks identified in this Declaration, select 'Yes.' If your organization does not have an on-going review and mitigation process, select 'No.'

If 'Yes,' the **Supporting Documentation Required** column updates, in red, to 'Proof of Risk Assessment Required.' Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

    c)   Your labour supply chain?

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

With regards to your organization's labour supply, if your organization works, in an ongoing fashion, to identify and mitigate the risks identified in this Declaration, select 'Yes.' If your organization does not have an on-going review and mitigation process, select 'No.'

If 'Yes,' the **Supporting Documentation Required** column updates, in red, to 'Proof of Risk Assessment Required.' Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 19: If you answered 'Yes' in Question 18, does your organization respond to the identified risk on an on-going basis, using this to drive continual improvement?

If your organization has a defined risk response policy or policies, select 'Yes.' If your organization does not have such a policy, select 'No.'

If 'Yes,' the **Supporting Documentation Required** column updates to 'Proof of risk response required.' Choose 'URL' for supporting documentation accessible on the Internet or 'File' for an electronic version of the documentation attached to this Declaration. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 20: If you answered 'Yes' to Question 18, does your organization use an independent third party to conduct these due diligence activities?

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

If you answered 'Yes' in Question 18 and your organization uses an independent third party to conduct the due diligence activities mentioned in Question 18, select 'Yes' in the **Response** field. If you answered 'Yes' to Question 18 but your organization does not use an independent third party to conduct said due diligence activities, select 'No.'

If 'Yes', the corresponding **Supporting Documentation Required** column will indicate 'Proof of third-party verification required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the Declaration tab.

Note: If you answered Question 18 with 'No', you are not required to provide an answer to questions 19 and 20.

Question 21: What percentage of relevant suppliers provided a response to your due diligence survey, such as the Slavery and Trafficking Risk Template (STRT)?

Prior to answering this question, refer to the **Glossary**

tab for the definition of 'due diligence' and 'supplier.'

Select the appropriate percentage range from the drop-down menu.

Question 22: *Does your organization conduct a formal vulnerability assessment of its workers to slavery and human trafficking?*

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

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

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

If 'Yes', the corresponding **Supporting Documentation Required** column will indicate 'Proof of assessment' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

TRAINING

Question 23: *Do your workers who have direct responsibility for supply chain management and recruitment receive training on how to mitigate risk of slavery and human trafficking?*

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

If your organization provides training to workers who have direct responsibility for supply chain management and recruitment on how to mitigate risk of slavery and human trafficking, select or type answer 'Yes' in the **Re-**

sponse field. If not, select or type 'No.'

If 'Yes', the **Supporting Documentation Required** column will indicate 'Proof of training required' in red. Choose the 'URL' or 'File' option from the drop down in the URL or File field. Add the URL or corresponding file name(s) into the Insert URL to relevant document(s) or corresponding file name(s) field of the Declaration tab.

REPORTING & INTERNAL ACCOUNTABILITY

Question 24: *Does your organization have a process for workers and agents to report, without fear of retaliation, matters related to slavery and human trafficking?*

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

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

If 'Yes', the **Supporting Documentation Required** column will indicate 'Proof of reporting process required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 25: *Does your organization maintain internal accountability standards and procedures to respond to a failure by workers and agents to meet organization policies regarding slavery and human trafficking?*

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

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

If 'Yes', the **Supporting Documentation Required** column will indicate 'Proof of standard required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Question 26: Does your organization have processes in place to provide for or participate in remedy when there is an adverse impact related to the topic(s) covered by this Declaration?

If your organization has processes in place to provide for or participate in remedy associated with the issues covered in this Declaration, select 'Yes.' If your organization does not have any such policies or procedures in place, select 'No.'

If 'Yes,' the **Supporting Documentation Required** column updates to 'Proof of remedy process required.' Choose 'URL' for supporting documentation accessible on the Internet or 'File' for an electronic version of the documentation attached to this Declaration. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

CERTIFICATION

Question 27: Does your organization prioritize the use of ethical recruitment agencies certified by credible assurance schemes?

If you certify that all the answers provided in this document are true and accurate to the best of your knowledge and un-

derstanding, and commit to providing evidence to support all of your answers if and as required by your customer, answer 'Yes' to this section. If your answer is 'No', the STRT will be invalid.

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

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

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

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

If 'Yes', the **Supporting Documentation Required** column will indicate 'Proof of prioritization' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

PUBLIC DISCLOSURE

Question 28: Does your organization publicly disclose information on its efforts to address human trafficking and slavery? Note: Public disclosures may be compiled to comply with legal or regulatory obligations.

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

If your organization publicly discloses information on its

efforts to address human trafficking and slavery, select or type answer 'Yes' in the **Response** field. If not, select or type 'No.'

If 'Yes', the **Supporting Documentation Required** column will indicate 'Proof of public disclosure required' in red. Choose the 'URL' or 'File' option from the drop down in the **URL or File** field. Add the URL or corresponding file name(s) into the **Insert URL to relevant document(s) or corresponding file name(s)** field of the **Declaration** tab.

Certification

Certification: Do you certify that all the answers provided in this document are true and accurate to the best of your knowledge and understanding, and commit to providing evidence to support all your answers if and as required by your customer?

If you certify that all the answers provided in this document are true and accurate to the best of your knowledge and understanding and commit to providing evidence to support all your answers if and as required by your customer, answer 'Yes' to this section. If your answer is 'No', the STRT will be invalid.

Countries

The **Countries** tab contains the list of Tier 2, Tier 2 Watchlist, Tier 3, Special Case countries and North Korean workers according to the US Department of State's Trafficking in Persons report (updated annually). **This list is required to answer Questions 1 and 2 of the STRT.**

Users may use this tab for reference to answer Questions 1 and 2. They may use the dropdown in the Selection column next to countries to select 'Yes' if their organization, or their suppliers, operate in those countries. The default selection is 'No.' If users answer 'Yes' to Question 1 of the STRT, at least one selection **MUST** be made on the **Countries** tab.

Sectors

The Sectors tab contains a list of sectors in which human trafficking activities are known to occur. This list is required to answer Question 3 of the STRT.

Before selecting, users should refer to the **Glossary** to define each of the listed sectors.

Users may use this tab for reference to answer Question 3. They may use the dropdown in the **Selection** column next to the sectors to select 'Yes' if their organization, or their suppliers, operate in those sectors. The default selection is 'No.' If users answer 'Yes' to Question 3 of the STRT, at least one selection MUST be made on the **Sectors** tab.

Source Countries

The Source Countries tab contains a matrix of values that associates the good(s) selected in the Goods of Portential Concern portion of the Organization Information section of the Declaration with jurisdictions and countries, and then with your organization's participation in the production or sourcing of the highlighted goods.

Before completing the matrix, refer to the **Glossary** tab for the definitions of 'direct supply chain,' 'organization,' and 'supplier.'

The rows associated with the good(s) selected in the Goods of Portential Concern portion of the Declaration are highlighted in the Source Countries tab. For each good identified in the Goods of Portential Concern, identify the country/jurisdiction from which the good is produced directly or sourced, either directly or indirectly.

My Organization Produces This Good in this Source Country/Jurisdiction

Use the first column to identify countries/jurisdictions where your organization is directly involved in the production of the good(s).

My Organization Sources (Directly or Indirectly) This Good from this Source Country/Jurisdiction. Sourcing Refers to the Location in which the Good is Mined, Grown, or Manufactured.

Review

The **Review** tab can be used to verify all required fields of the STRT are completed. Required fields in red indicate information is missing. Required fields in green are complete. If information is missing from a required field, the **Review** tab indicates which responses are missing and for which question or sub-question.

The **Required Field** column indicates which necessary field needs to be completed, as well as what response you have provided. The tab indicates what supporting documentation is required and shows you what URL or file you have provided.

Click on the **Go to Question** column for the corresponding field to navigate to the appropriate field on the **Declaration** tab. By using these links on the **Review** tab, users can quickly navigate to missing fields on the **Declaration** tab to complete the STRT.

Glossary

The **Glossary** tab can be used to reference terms used throughout the STRT that may be unclear. This tab can be referenced at any time throughout the completion process for guidance, definitions, or descriptions.

About Us

The Slavery & Trafficking Risk Template (STRT) was created by a Development Committee comprised of industry partners, subject matter experts, legal experts, and other stakeholders. The template is reviewed and updated annually.

If you have any questions or comments concerning the STRT, please contact **info@sraglobal.org** for assistance.