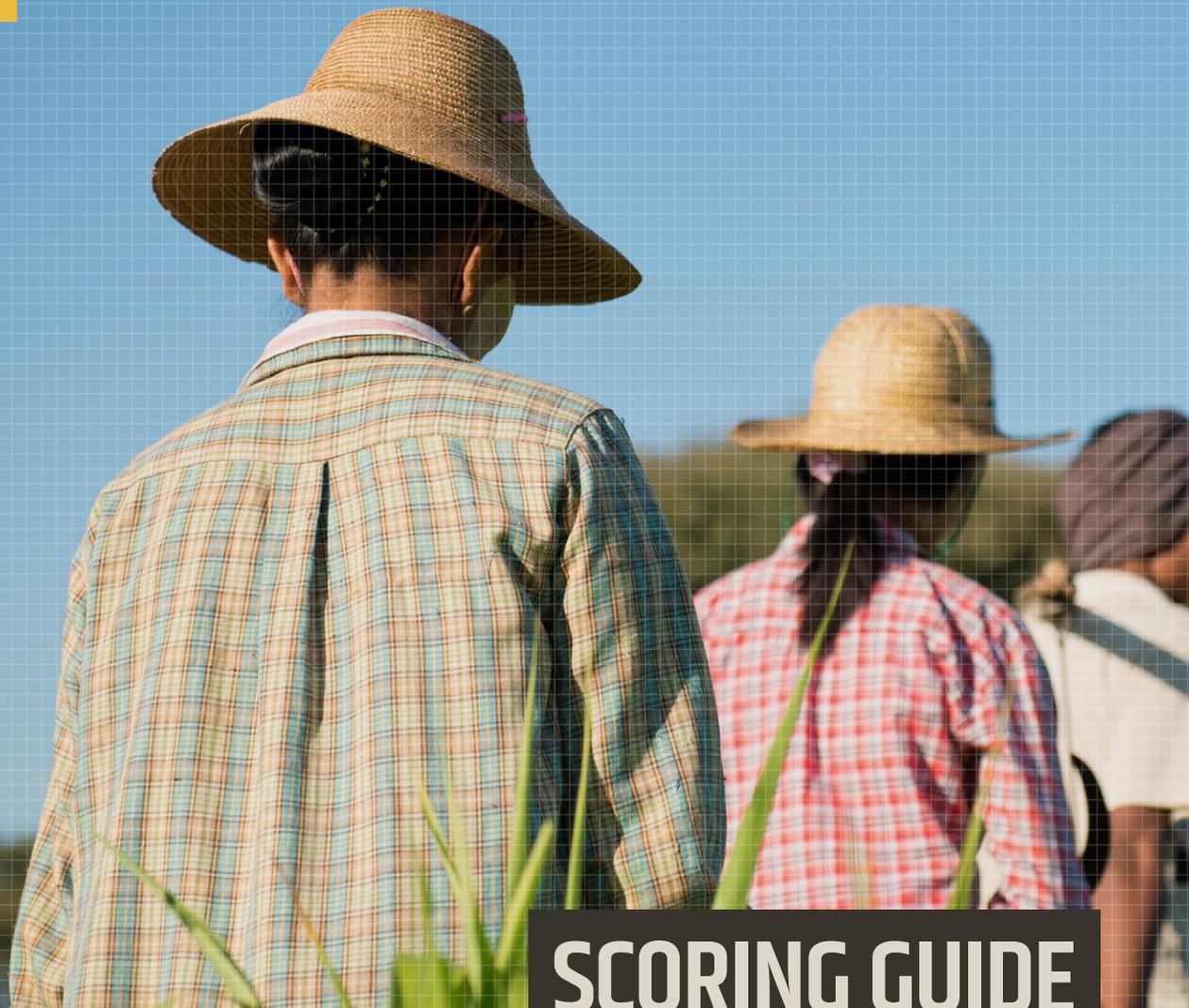




SRA

SLAVERY & TRAFFICKING RISK TEMPLATE (STRT)

VERSION 1.2



SCORING GUIDE

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PART 1: OVERVIEW

Purpose of This Guide

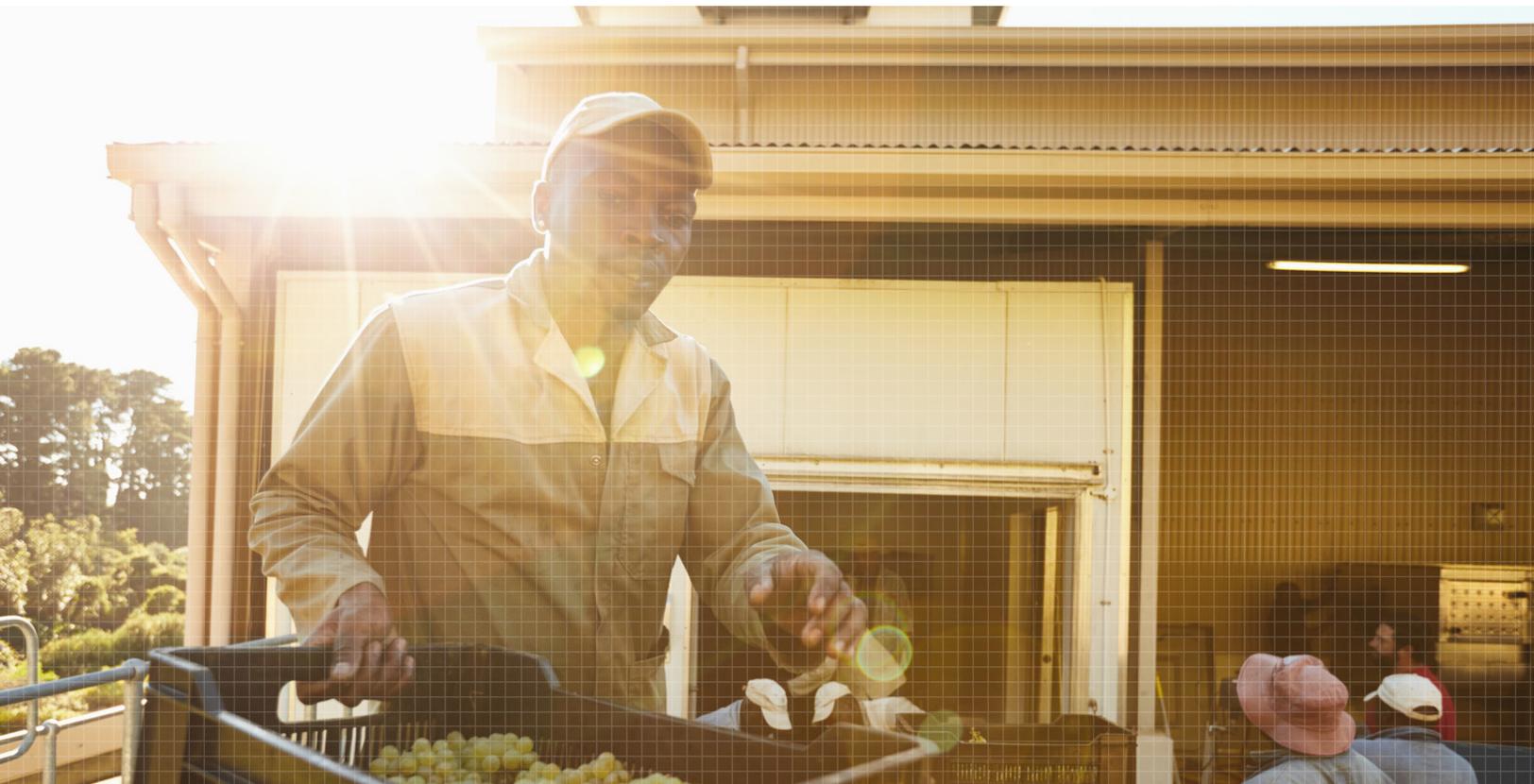
This guide aims to help organizations score data they've collected from their suppliers using the Slavery & Trafficking Risk Template (STRT). While collecting the data itself is an important undertaking, scoring the data is a necessary follow-up in order to fully leverage the STRT within your company's slavery and human trafficking program.

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

The Slavery & Trafficking Risk Template (STRT) is the free, open-source, industry-standard template used to assist organizations in their efforts to comply with human trafficking and modern slavery legislation, and

improve their supply chain-related public disclosures. It does so by giving organizations visibility into human trafficking and slavery risks, as well as regulatory compliance, among their suppliers.

Organizations can generate scores on a range of different parameters, as described in this guide, using data collected from their suppliers via the STRT. Scoring has a range of benefits. It allows organizations to easily identify suppliers to prioritize for follow-up risk mitigation and prevention action. Organizations can also quickly and quantitatively track supplier progress when data is collected over time. Both contribute to strong reporting, enabling organizations to demonstrate their due diligence action to internal and external stakeholders, and offer declarable statements demonstrating concerted action to achieve continuous improvement.



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?

Low risk (no perceived inherent risk), low risk (adequate risk control), medium risk, and high risk.

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

What does it measure?

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 PUBLIC DISCLOSURE REGULATIONS

What does it measure?

A supplier's compliance with public disclosure regulations, like the UK Modern Slavery Act and the California Transparency in Supply Chains Act.

How are suppliers categorized?

Non-compliant, compliant, 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. As examples, it includes two sample risk scoring algorithms 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 four different categories, with the following interpretations.

Suppliers operating in a low-risk industry, low-risk geography with a low-risk workforce have:

- No indication of inherent risk → **low risk (no perceived inherent risk)**

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

- Adequately control risk → **low risk (adequate risk control)**
- Partially control risk → **medium risk**
- Do not adequately control risk → **high risk**

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

		PERCEIVED INHERENT RISK	
		Yes	No
RISK CONTROL	Adequate	Low Risk (Adequate Risk Control)	Low Risk (No Perceived Inherent Risk)
	Partial	Medium Risk	Low Risk (No Perceived Inherent Risk)
	Inadequate	High Risk	Low Risk (No Perceived Inherent Risk)

Risk Scoring Methodology

The below presents a step-by-step methodology for categorizing suppliers into the four slavery and human trafficking risk categories described above.

Step 1: Is the Supplier Operating in a Low-Risk Geography, Low-Risk Industry With a Low-Risk Workforce?

Questions 1 to 5 in the STRT 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 5 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 Step 2.

Step 2: Is the Supplier Adequately Controlling for Risk?

Questions 6 to 20 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 6 to 20 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 Step 3.

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 5 is irrelevant to this calculation, and is used instead to indicate that this calculation is needed due to the presence of inherent risk.

Step 3: Is the Supplier Partially Controlling for Risk?

The cumulative score for Questions 1 to 20 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 20 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 four 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 (no perceived 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 four 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 (no perceived 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.

Human Trafficking & Slavery Risk Scoring Algorithm: Worksheet

Fill out the template for your organization's risk scoring algorithm [here](#).

C. RISK SCORING ALGORITHMS: TWO SAMPLE APPROACHES

The below identifies two possible approaches to assigning points to questions in the STRT, as well as different thresholds for each risk category. An explanation and interpretation follows the tables. These sample risk scoring approaches are not intended to be prescriptive, but rather to serve as examples for an organization when designing its own risk scoring algorithm.

Sample Approach A

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 their suppliers' vulnerability to trafficked and slave labour occurring in their operations and supply chain. It is risk averse, so has designed its methodology to err on the side of higher risk rather than lower risk.

2. OVERVIEW

a. Low Risk (No Perceived Inherent Risk) Category

In *Sample Approach A*, the threshold for a supplier to be considered low risk is set at below four points. Points for Questions 1 through 5 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 (no perceived 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 through 5 are "trigger questions."

As with the rest of the questions in the STRT, points for Questions 1 through 5 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.

b. 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 6 through 20 are assigned in such a manner that a single risk response (e.g. "No" response) to Question 8, 9, or 10 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 8, 9, and 10 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 6 through 20 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.

c. Medium and 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 20 are assigned in such a manner that a supplier with risk scores for every supply chain-related question (Questions 2, 3, 8, 10, 11, 12, and 15) would exceed 40 points and be categorized as high risk.

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
1	Yes	-	5 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (no perceived inherent risk)” category
	Blank	-	5 points	
	No	-	0 points	
2	Yes	-	5 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (no perceived inherent risk)” category
	Blank	-	5 points	
	No	-	0 points	
3	Yes	-	4 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (no perceived inherent risk)” category
	Blank	-	4 points	
	No	-	0 points	
4	Yes	-	6 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (no perceived inherent risk)” category
	Blank	-	6 points	
	No	-	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
5	Yes if Question 4 is answered	-	10 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (no perceived inherent risk)” category
	Yes	-	10 points	
	Yes if Question 4 is left blank	-	10 points	
	Blank if Question 4 is answered Yes	-	10 points	
	Blank if Question 4 is left blank	-	10 points	
	N/A if Question 4 is answered Yes	-	0 points	
	N/A if Question 4 is left blank	-	0 points	
	Blank if Question 4 is answered No	-	0 points	
	N/A if Question 4 is answered No	-	0 points	
	Yes if Question 4 is answered No	-	16 points	Incongruent
6a	No	-	1 point	
	Blank	-	1 point	
	Yes	No	1 point	
	Yes	Yes	0 points	
6b	No	-	1 point	
	Blank	-	1 point	
	Yes	No	1 point	
	Yes	Yes	0 points	
6c	No	-	2.5 points	
	Blank	-	2.5 points	
	Yes	No	2.5 points	
	Yes	Yes	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
6d	No	-	2 points	
	Blank	-	2 points	
	Yes	No	2 points	
	Yes	Yes	0 points	
	N/A - We do not use recruiters	-	0 points	
6e	No	-	2.5 points	
	Blank	-	2.5 points	
	Yes	No	2.5 points	
	Yes	Yes	0 points	
6f	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	Blank	-	0 points	
	No	-	0 points	
		-		
7a	No	-	2 points	
	Blank	-	2 points	
	Yes	No	2 points	
	Yes	Yes	0 points	
	N/A - We do not hire foreign migrant workers	-	0 points	
7b	No	-	1 point	
	Blank	-	1 point	
	Yes	No	1 point	
	Yes	Yes	0 points	
	N/A - We do not provide or arrange housing	-	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
7c	No	-	2 points	
	Blank	-	2 points	
	Yes	No	2 points	
	Yes	Yes	0 points	
	N/A - We do not hire foreign or domestic migrant workers	-	0 points	
7d	No	-	1 point	
	Blank	-	1 point	
	Yes	No	1 point	
	Yes	Yes	0 points	
7e	No	-	2 points	
	Blank	-	2 points	
	Yes, but only when required by law or by contract	No	2 points	
	Yes, but only when required by law or by contract	Yes	2 points	
	Yes, and this applies to all employees, whether required by law	No	2 points	
	Yes, and this applies to all employees, whether required by law	Yes	0 points	
7f	No	-	1 point	
	Blank	-	1 point	
	Yes	No	1 point	
	Yes	Yes	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES	
8	No	-	10 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category	
	Blank	-	10 points		
	Yes	No	10 points		
	Yes	Yes	0 points		
	N/A - We do not work with any suppliers	-	0 points		
9	No	-	10 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category	
	Blank	-	10 points		
	Yes	No	10 points		
	Yes	Yes	0 points		
	N/A - We do not use recruiters	-	0 points		
10	No	-	10 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category	
	Blank	-	10 points		
	Yes	No	10 points		
	Yes	Yes	0 points		
11	No <u>if</u> Question 10 is answered No	-	5 points		
	No <u>if</u> Question 10 is answered Yes	-	5 points		
	No <u>if</u> Question 10 is left blank	-	5 points		
	Left blank <u>if</u> Question 10 is answered No	-	5 points		
	Left blank <u>if</u> Question 10 is answered Yes	-	5 points		
	Left blank <u>if</u> Question 10 is left blank	-	5 points		
	Yes <u>if</u> Question 10 is answered No	-	15 points		Incongruent
	Yes <u>if</u> Question 10 is answered Yes	-	0 points		
	Yes <u>if</u> Question 10 is left blank	-	0 points		

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
12	No	-	5 points	
	Blank	-	5 points	
	Yes	No	5 points	
	Yes	Yes	0 points	
13	No	-	5 points	
	Blank	-	5 points	
	Yes	No	5 points	
	Yes	Yes	0 points	
14	No	-	5 points	
	Blank	-	5 points	
	Yes	No	5 points	
	Yes	Yes	0 points	
15	No	-	2 points	
	Blank	-	2 points	
	N/A - We do not work with any suppliers	-	0 points	
	Yes	No	2 points	
	Yes	Yes	2 points	
16a	Yes	-	0 points	Note: this question is specific to compliance with public disclosure regulations
	No	-	0 points	
	Blank	-	0 points	
16b	Yes	-	0 points	Note: this question is specific to compliance with public disclosure regulations
	No	-	0 points	
	Blank	-	0 points	
17	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	No	-	0 points	
	Blank	-	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
18	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	No	-	0 points	
	Blank	-	0 points	
19	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	No	-	0 points	
	Blank	-	0 points	
20	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	No	-	0 points	
	Blank	-	0 points	
Cumulative score			100 Points	

THRESHOLDS						
Sample Approach A	Low Risk (No Perceived Inherent Risk)	Low Risk (Adequate Risk Control)		Medium Risk	High Risk	
		<p><u>Cumulative score for Questions 1 to 5:</u> Below 4 points (out of a possible 30 points)</p>	<p>If a supplier is not low risk (no perceived inherent risk), advance to next calculation</p>	<p><u>Cumulative score for Questions 6 to 20:</u> 9 points or below (out of a possible 70 points)</p>	<p>If a supplier is not low risk (adequate risk control), advance to next calculation</p>	<p><u>Cumulative score for Questions 1 to 20:</u> 40 points or below (out of a possible 100 points)</p>

Sample Approach B

1. SCENARIO

Though Organization Beta operates in a sector where slavery and human trafficking risk is known to manifest itself among its first-tier suppliers, it is confident its suppliers are adequately controlling for risk in their own operations. It is instead more interested in assessing how well its suppliers are controlling for risk among their own suppliers, and has developed its scoring methodology accordingly. It is risk averse, so has designed its methodology to err on the side of higher risk rather than lower risk.

2. OVERVIEW

a. Low Risk (No Perceived Inherent Risk) Category

In *Sample Approach B*, the threshold for a supplier to be considered low risk (no perceived inherent risk) is set at below eight points. Points for Questions 1 to 5 are assigned in such a manner that a single answer of “Yes” to Questions 2 or 3 exceeds the number of points required to be categorized as a low-risk (no perceived 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 2 and 3 are “trigger questions.”

In *Sample Approach B*, Organization Beta revises the meaning of the low risk (not perceived inherent risk) category to reflect its scoring approach. The updated meaning of the category is “suppliers whose suppliers operate in a low-risk industry and a low-risk geography.”

As with the rest of the questions in the STRT, points for Questions 1 through 5 are allocated in a way that places greater weight on questions relating to the suppliers’ supply chain (in this case, Questions 2 and 3).

b. Low Risk (Adequate Risk Control) Category

The threshold for a supplier to be considered low risk (adequate risk control) is set at seven points. Points for Questions 6 to 20 are assigned in such a manner that a single answer of “No” to Question 8, 10, 11, or 12 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 8, 10, 11, and 12 are “trigger questions.”

As with the rest of the questions in the STRT, points for Questions 6 through 20 are allocated in a way that reflects the impact of the question on controlling for slavery and human trafficking risk while placing greater weight on questions relating to the supplier’s supply chain (in this case, Questions 8, 10, 11, and 12).

c. Medium and High Risk Category

The threshold for a supplier to be considered medium risk is set at 61 points. Points for Questions 1 to 20 are assigned in such a manner that a supplier with risk scores for every supply chain-related question (Questions 2, 3, 8, 10, 11, 12, and 15) would exceed 61 points and be categorized as high risk.

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
1	Yes	-	3 points	
	Blank	-	3 points	
	No	-	0 points	
2	Yes	-	8 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (no perceived inherent risk)” category
	Blank	-	8 points	
	No	-	0 points	
3	Yes	-	8 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (no perceived inherent risk)” category
	Blank	-	8 points	
	No	-	0 points	
4	Yes	-	3 points	
	Blank	-	3 points	
	No	-	0 points	
5	Yes <u>if</u> Question 4 is answered Yes	-	6 points	
	Yes <u>if</u> Question 4 is left blank	-	6 points	
	Blank <u>if</u> Question 4 is answered Yes	-	6 points	
	Blank <u>if</u> Question 4 is left blank	-	6 points	
	N/A <u>if</u> Question 4 is answered Yes	-	0 points	
	N/A <u>if</u> Question 4 is left blank	-	0 points	
	Blank <u>if</u> Question 4 is answered No	-	0 points	
	N/A <u>if</u> Question 4 is answered No	-	0 points	
	Yes <u>if</u> Question 4 is answered No	-	16 points	Incongruent

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
6a	No	-	0.5 point	
	Blank	-	0.5 point	
	Yes	No	0.5 point	
	Yes	Yes	0 points	
6b	No	-	0.5 point	
	Blank	-	0.5 point	
	Yes	No	0.5 point	
	Yes	Yes	0 points	
6c	No	-	2 points	
	Blank	-	2 points	
	Yes	No	2 points	
	Yes	Yes	0 points	
6d	No	-	1.5 points	
	Blank	-	1.5 points	
	N/A - We do not use recruiters	-	0 points	
	Yes	No	1.5 points	
	Yes	Yes	0 points	
6e	No	-	2 points	
	Blank	-	2 points	
	Yes	No	2 points	
	Yes	Yes	0 points	
6f	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	Blank	-	0 points	
	No	-	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
7a	No	-	1 point	
	Blank	-	1 point	
	Yes	No	1 point	
	Yes	Yes	0 points	
	N/A - We do not hire foreign migrant workers	-	0 points	
7b	No	-	0.5 point	
	Blank	-	0.5 point	
	Yes	No	0.5 point	
	Yes	Yes	0 points	
	N/A - We do not provide or arrange housing	-	0 points	
7c	No	-	1.5 points	
	Blank	-	1.5 points	
	Yes	No	1.5 points	
	Yes	Yes	0 points	
	N/A - We do not hire foreign or domestic migrant workers	-	0 points	
7d	No	-	1 point	
	Blank	-	1 point	
	Yes	No	1 point	
	Yes	Yes	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
7e	No	-	1.5 points	
	Blank	-	1.5 points	
	Yes, but only when required by law or by contract	No	1.5 points	
	Yes, but only when required by law or by contract	Yes	1.5 points	
	Yes, and this applies to all employees, whether required by law	No	1.5 points	
	Yes, and this applies to all employees, whether required by law	Yes	0 points	
7f	No	-	1 point	
	Blank	-	1 point	
	Yes	No	1 point	
	Yes	Yes	0 points	
8	No	-	15 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category
	Blank	-	15 points	
	Yes	No	15 points	
	Yes	Yes	0 points	
	N/A - We do not work with any suppliers	-	0 points	
9	No	-	5 points	
	Blank	-	5 points	
	Yes	No	5 points	
	Yes	Yes	0 points	
	N/A - We do not use recruiters	-	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
10	No	-	15 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category
	Blank	-	15 points	
	Yes	No	15 points	
	Yes	Yes	0 points	
11	No if Question 10 is answered No	-	7 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category
	No if Question 10 is answered Yes	-	7 points	
	No if Question 10 is left blank	-	7 points	
	Left blank if Question 10 is answered No	-	7 points	
	Left blank if Question 10 is answered Yes	-	7 points	
	Left blank if Question 10 is left blank	-	7 points	
	Yes if Question 10 is answered No	-	22 points	Incongruent
	Yes if Question 10 is answered Yes	-	0 points	
Yes if Question 10 is left blank	-	0 points		
12	No	-	7 points	Trigger question: Risk response automatically moves the supplier out of the “low risk (adequate risk control)” category
	Blank	-	7 points	
	Yes	No	7 points	
	Yes	Yes	0 points	
13	No	-	4 points	
	Blank	-	4 points	
	Yes	No	4 points	
	Yes	Yes	0 points	

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
14	No	-	4 points	
	Blank	-	4 points	
	Yes	No	4 points	
	Yes	Yes	0 points	
15	No	-	2 points	
	Blank	-	2 points	
	N/A - We do not work with any suppliers	-	0 points	
	Yes	No	2 points	
	Yes	Yes	2 points	
16a	Yes	-	0 points	Note: this question is specific to compliance with public disclosure regulations
	No	-	0 points	
	Blank	-	0 points	
16b	Yes	-	0 points	Note: this question is specific to compliance with public disclosure regulations
	No	-	0 points	
	Blank	-	0 points	
17	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	No	-	0 points	
	Blank	-	0 points	
18	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	No	-	0 points	
	Blank	-	0 points	
19	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	No	-	0 points	
	Blank	-	0 points	

STRT SCORING GUIDE

STRT QUESTION	STRT QUESTION RESPONSE	VALID SUPPORTING DOCUMENTATION?	POINTS	NOTES
20	Yes	-	0 points	Note: this question is specific to compliance with the US Federal Acquisition Regulation (FAR) Final Rule on Combating Trafficking in Persons (52.222-50)
	No	-	0 points	
	Blank	-	0 points	
Cumulative score			100 Points	

THRESHOLDS						
Sample Approach B	Low Risk (No Indication of Inherent Risk)	Low Risk (Adequate Risk Mitigation)		Medium Risk	High Risk	
		<u>Cumulative score for Questions 1 to 5:</u> Below 8 points (out of a possible 28 points)	If a supplier is not low risk (no perceived inherent risk), advance to next calculation	<u>Cumulative score for Questions 6 to 20:</u> 6 points or below (out of a possible 72 points)	If a supplier is not low risk (adequate risk control), advance to next calculation	<u>Cumulative score for Questions 1 to 20:</u> 61 points or below (out of a possible 100 points)

PART 3: 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 suppliers 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 suppliers 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. 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. 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.

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
1	Not relevant	
2	Not relevant	
3	Not relevant	
4	Not relevant	
5	Not relevant	
6a	Relevant (Source: 48 Code of Federal Regulations 22.1703 (a)(1) and (3))	Yes (with valid supporting documentation)
6b	Not relevant	
6c	Relevant (Source: 48 CFR 22.1703 (a)(4))	Yes (with valid supporting documentation)
6d	Relevant (Source: 48 CFR 22.1703 (a)(5ii))	Yes (with valid supporting documentation) N/A - We do not use recruiters
6e	Relevant (Source: 48 CFR 22.1703 (a)(6))	Yes (with valid supporting documentation)
6f	Relevant (Source: 48 CFR 22.1703 (a)(2))	Yes (with valid supporting documentation)
7a	Relevant (Source: 48 CFR 22.1703 (a)(7))	Yes (with valid supporting documentation) N/A - We do not hire foreign migrant workers
7b	Relevant (Source: 48 CFR 22.1703 (a)(8))	Yes (with valid supporting documentation) N/A - We do not provide or arrange housing
7c	Not relevant	
7d	Relevant when question 17 is answered "Yes" (Source: 48 CFR 52.222-50 (h))	Yes (with valid supporting documentation)
7e	Relevant (Source: 48 CFR 22.1703 (a)(9))	Yes, but only when required by law or by contract (with valid supporting documentation) Yes, and this applies to all employees, whether required by law (with valid supporting documentation)
7f	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
8	Relevant (Source: 48 CFR 52.222-50 (i))	Yes (with valid supporting documentation) N/A - We do not work with any suppliers
9	Relevant when question 17 is answered "Yes" (Source: 48 CFR 52.222-50 (h))	Yes (with valid supporting documentation) N/A - We do not use recruiters
10	Relevant when question 17 is answered "Yes" (Source: 48 CFR 52.222-50 (h))	Yes (with valid supporting documentation)
11	Not relevant	
12	Relevant when question 17 is answered "Yes" (Source: 48 CFR 52.222-50 (h))	Yes (with valid supporting documentation)
13	Relevant when question 17 is answered "Yes" (Source: 48 CFR 52.222-50 (h))	Yes (with valid supporting documentation)
14	Relevant (Source: 48 CFR 52.222-50 ©)	Yes (with valid supporting documentation)
15	Not relevant	
16a	Not relevant	
16b	Not relevant	
17	Relevant (Source: 48 CFR 52.222-50 (h))	
18	Relevant when question 17 is answered "Yes" (Source: 48 CFR 52.222-50 (h))	Yes (with valid supporting documentation)
19	Relevant when question 17 is answered "Yes" (Source: 48 CFR 52.222-50 (h))	Yes (with valid supporting documentation)
20	Relevant when question 17 is answered "Yes" (Source: 48 CFR 52.222-50 (h))	Yes (with valid supporting documentation)

PART 4: GENERATING A PUBLIC DISCLOSURE COMPLIANCE STATUS

Introduction

Organizations can use data collected from their suppliers using the STRT to generate a public disclosure compliance status. This status is relevant for suppliers required to publicly disclose information on their efforts to address slavery and human trafficking as a result of being in scope of regulations such as the UK Modern Slavery Act and the California Transparency in Supply Chains Act.

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

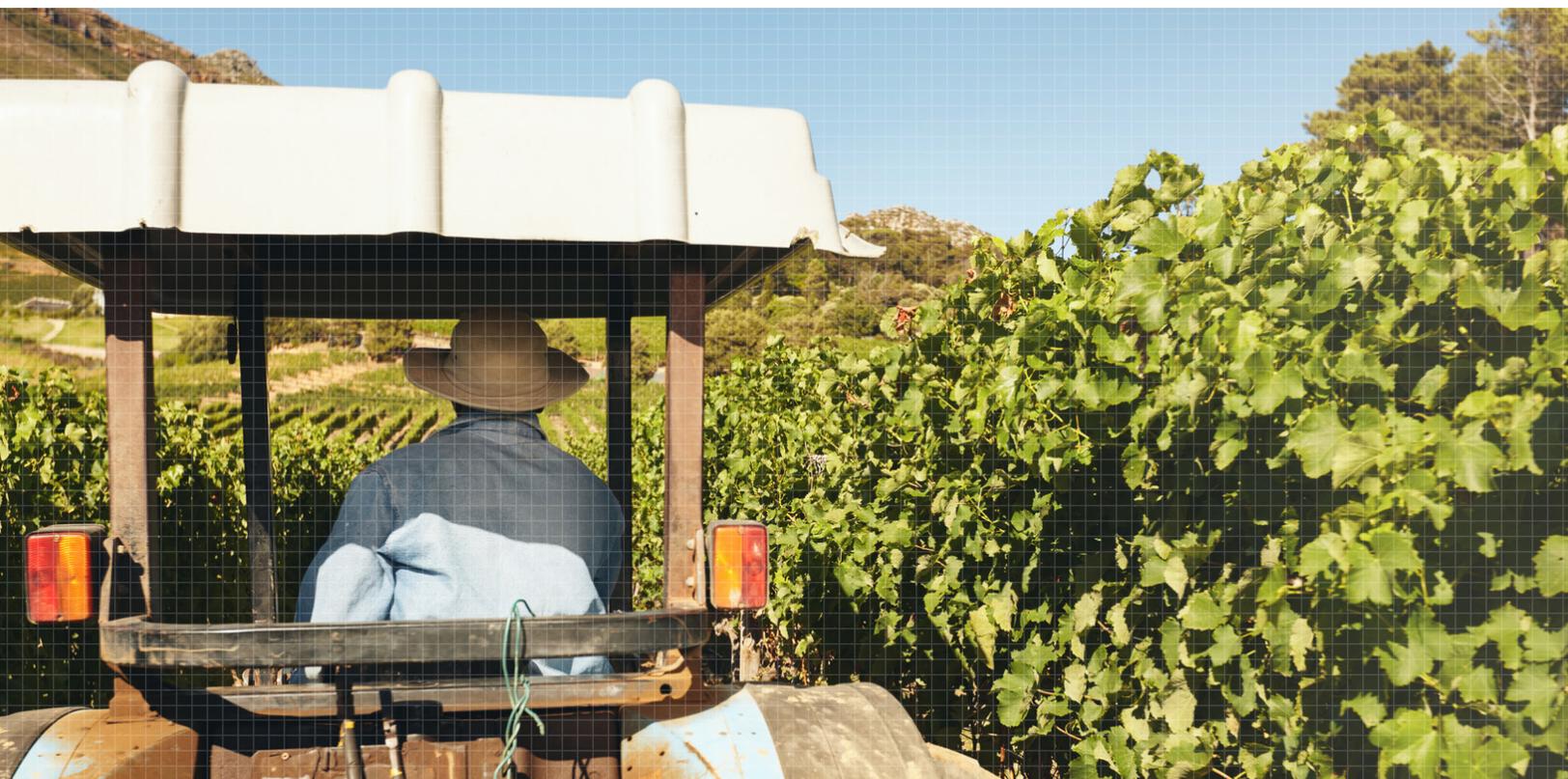
Supplier Categorization

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

Suppliers indicating compliance with applicable slavery and human trafficking public disclosure regulation(s) → **compliant**

Suppliers indicating non-compliance with applicable slavery and human trafficking public disclosure regulation(s) → **non-compliant**

Suppliers where compliance with applicable slavery and human trafficking public disclosure regulation(s) is unknown due to an incomplete STRT → **indeterminate**



Compliance Status Methodology

The methodology for categorizing suppliers into the three categories described above is much simpler for the public disclosure compliance status as a result of compliance being tied exclusively to Questions 16a and 16b. Suppliers are categorized as non-compliant if they respond “No” to Question 16b. They are categorized as indeterminate if they respond (1) Respond “Yes” to Question 16b, but fail to provide valid supporting documentation, or (2) leave Question 16b blank when responding “Yes” to Question 16a, or (3) leave Questions 16a and 16b blank. They are categorized as compliant if, as indicated in the table below, they respond “Yes” to Question 16b.

STRT QUESTION	RELEVANCE TO US FAR FINAL RULE ON COMBATING TRAFFICKING IN PERSONS (52.222-50)	STRT RESPONSE(S) INDICATING COMPLIANCE WITH US FAR
1	Not relevant	
2	Not relevant	
3	Not relevant	
4	Not relevant	
5	Not relevant	
6a	Not relevant	
6b	Not relevant	
6c	Not relevant	
6d	Not relevant	
6e	Not relevant	
6f	Not relevant	
7a	Not relevant	
7b	Not relevant	
7c	Not relevant	
7d	Not relevant	
7e	Not relevant	
7f	Not relevant	
8	Not relevant	
9	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
10	Not relevant	
11	Not relevant	
12	Not relevant	
13	Not relevant	
14	Not relevant	
15	Not relevant	
16a	Relevant	
16b	Relevant when Question 16a is answered "Yes"	Yes (with valid supporting documentation)
17	Not relevant	
18	Not relevant	
19	Not relevant	
20	Not relevant	

PART 5: GENERATING A CODE OF CONDUCT COMPLIANCE STATUS

Though not the original intent of the STRT, organizations can use data collected from their suppliers using the STRT 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.

