



STRT 3.3 OVERVIEW

SLAVERY & TRAFFICKING RISK TEMPLATE

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

What Is the STRT?

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

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

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

Why Was the STRT Created?

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

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

How Does the STRT Work?

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

What Regulations Does the STRT Cover?

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

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

- The Canadian Customs Tariff Act (No. 9897.00.00)
- Lieferkettensorgfaltspflichtengesetz (German Act on Corporate Due Diligence Obligations in Supply Chains)
- Åpenhetsloven (Norwegian Transparency Act)
- Article 964 of the Swiss Code of Obligations (Obligationenrecht) (Swiss Conflict Minerals and Child Labour Due Diligence Ordinance)
- Canada Fighting Forced Labour and Child Labour in Supply Chains Act
- EU Corporate Sustainability Reporting Directive
- Mexico's Forced Labor Regulation

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

What's New in STRT 3.3?

Version 3.3 of the STRT includes revisions designed to maintain its value as a compliance tool that supports traceability on all high risk sectors for forced labor enforcement. In addition to reflecting recent changes to critical reference sources like the US Department of Labor's Bureau of International Labour Affairs (ILAB) List of Goods Produced by Child Labor or Forced Labor, STRT 3.3 also takes into consideration regulatory enforcement practices to include goods which, although not included in the reference sources, have legitimate regulatory weight behind them in the form of enforcement actions.

STRT 3.3 also responds to user feedback through the inclusion of functionalities that enhance the usability of the template.

Changes include:

1. Update to the “Introduction” tab to include the following to the list of regulations supported by the STRT:
 - Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act
 - Mexico’s Forced Labour Regulation
 - EU Corporate Sustainability Reporting Directive
As well as supporting reporting against the European Sustainability Reporting Standards (ESRS)
2. Update to the “Glossary” tab to include definitions for:
 - Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act
 - Mexico’s Forced Labour Regulation
 - EU Corporate Sustainability Reporting Directive
 - Workers to include apprentices.
 - Remedy
 - Grievance Mechanism
3. Update to the “Declaration” tab to add conditional logic to Q15 and Q16 so they are de-activated when Q14 is unanswered, or has been answered “No” or “N/A”, and activated when Q14 is answered “Yes”.
4. Update to the “Source Country” tab and “Declaration” tabs to add the following “Goods Scope” options:
 - Red Dates
 - Vinyl
 - Tires
 - Steel
 - Lead acid batteries
 - Copper
5. Update to the “Declaration” tab to revise logic in the STRT so that questions 9 and 10 do not appear in the Review Tab when the answer to these questions is NO.
6. Revised translation of “Korea” throughout the Chinese version of the document to ensure that the differences between North and South Korea are clearly differentiated and understood by Mandarin speakers.

How Does the STRT Benefit Organizations?

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

Where to Get More Information

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

