

# FY23 T+C AFL Survey -- Aggregate Results

*FY23 T+C Anti-Forced Labor Survey*

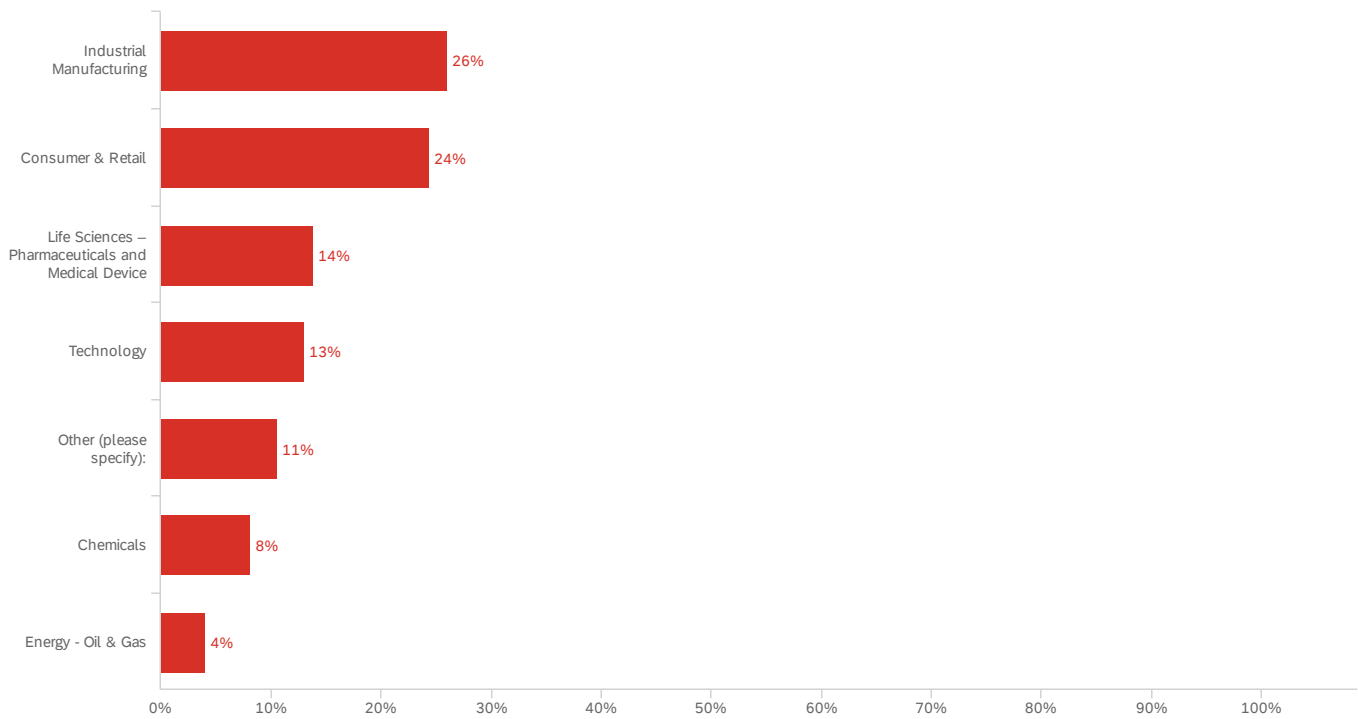
June 30, 2023 3:01 PM EDT

## Number of Completes [Response Type]

Field	Count
Completes	123

Showing rows 1 - 1 of 1

## Q2 - In which sector does your organization primarily operate? (select one)



Field	Choice Count
Industrial Manufacturing	26% 32
Consumer & Retail	24% 30
Life Sciences – Pharmaceuticals and Medical Device	14% 17
Technology	13% 16
Other (please specify):	11% 13
Chemicals	8% 10
Energy - Oil & Gas	4% 5
	123

Showing rows 1 - 8 of 8

### Q2\_29\_TEXT - Other (please specify):

Other (please specify):

Accounting

Automotive

Other (please specify):

Automotive

Automotive

Automotive

Consulting- all

Semiconductor

Services

Staffing

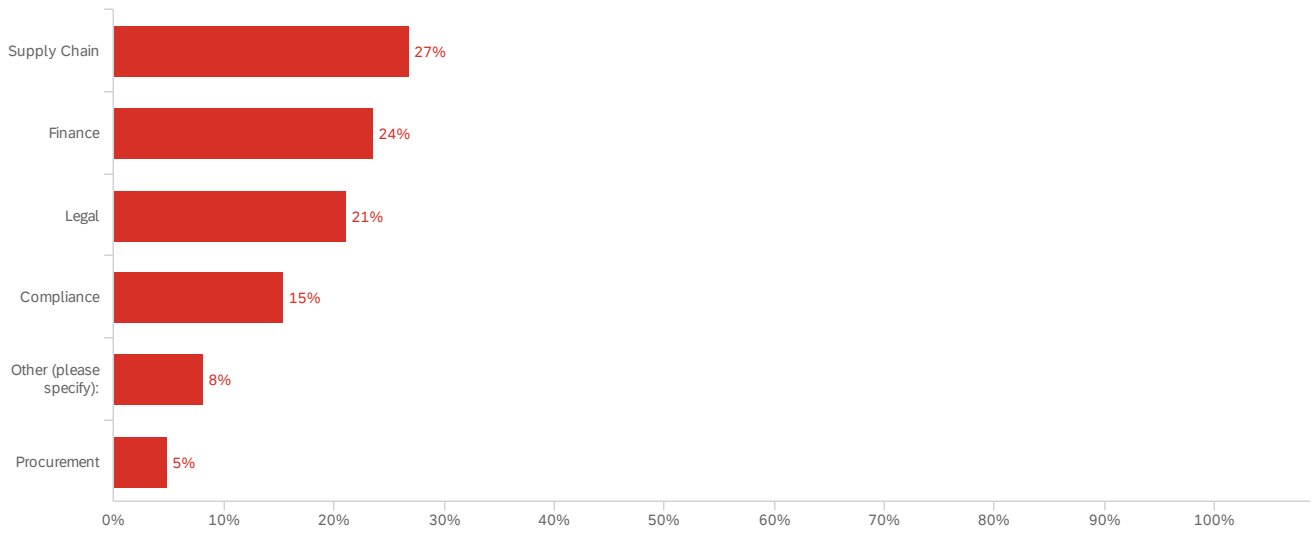
Trade Policy

Utilities

auto; consumer, other

financial

### Q3 - To which department does your trade function report ? (select one)



Field	Choice Count
Supply Chain	27% 33
Finance	24% 29
Legal	21% 26
Compliance	15% 19
Other (please specify):	8% 10
Procurement	5% 6

123

Showing rows 1 - 7 of 7

#### Q3\_8\_TEXT - Other (please specify):

Other (please specify):

Marketing

Operations

Operations

Procurement/Supply Chain Management

Sourcing

Other (please specify):

Tax

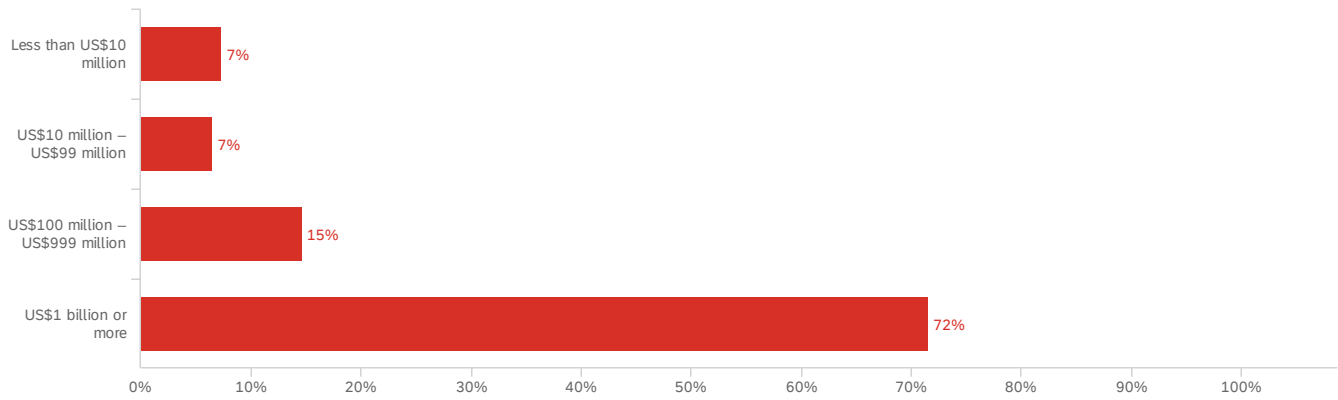
Tax

logistics

sourcing

tax

## Q4 - What is the annual revenue of your organization in US dollars? (select one)

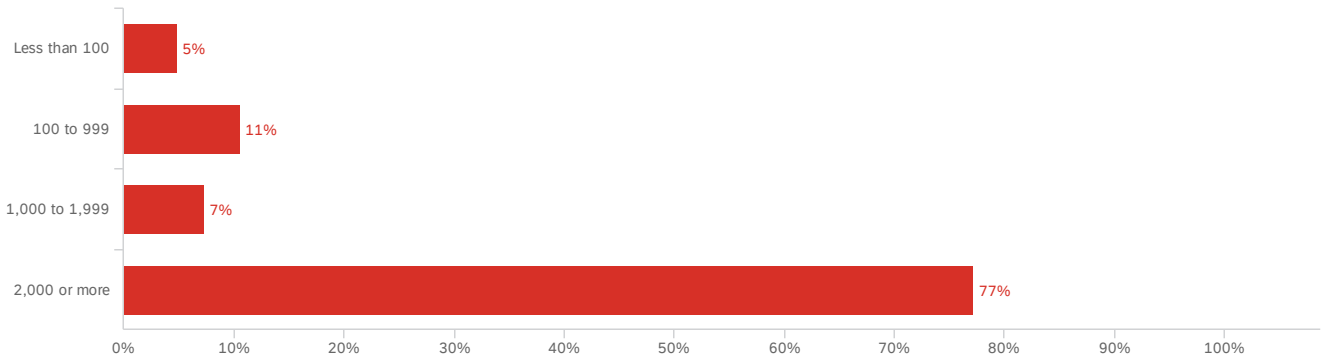


Field	Choice Count
Less than US\$10 million	7% 9
US\$10 million – US\$99 million	7% 8
US\$100 million – US\$999 million	15% 18
US\$1 billion or more	72% 88

123

Showing rows 1 - 5 of 5

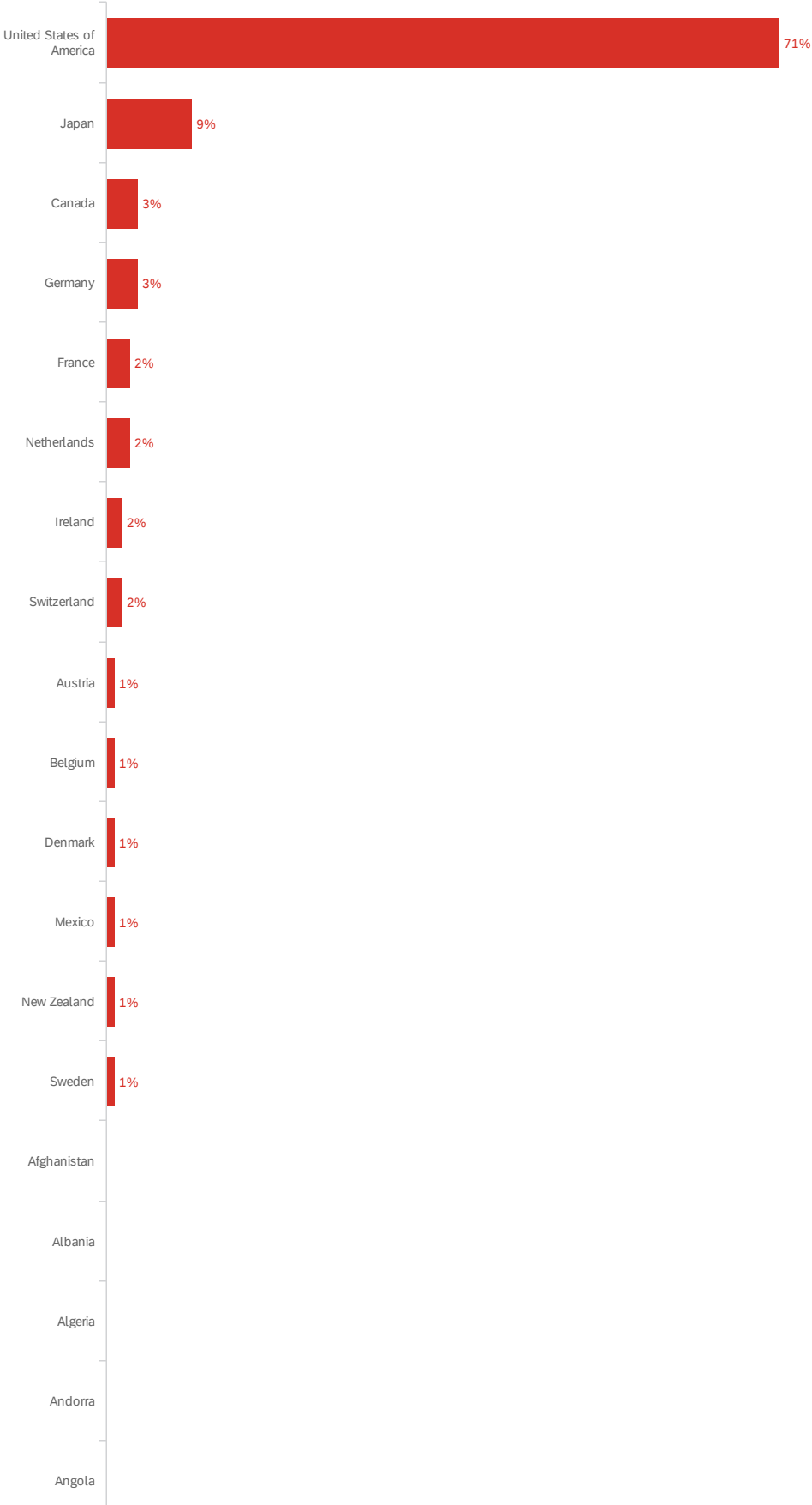
Q5 - What is the total number of employees across your organization (including permanent and contracted employees and temporary staff)? (select one)



Field	Choice Count
Less than 100	5% 6
100 to 999	11% 13
1,000 to 1,999	7% 9
2,000 or more	77% 95
	123

Showing rows 1 - 5 of 5

Q6 - In which country is your organization headquartered? (select one)





Antigua and Barbuda

Argentina

Armenia

Australia

Azerbaijan

Bahamas

Bahrain

Bangladesh

Barbados

Belarus

Belize

Benin

Bhutan

Bolivia

Bosnia and  
Herzegovina

Botswana

Brazil

Brunei Darussalam

Bulgaria

Burkina Faso

- ..

Burundi  
Cambodia  
Cameroon  
Cape Verde  
Central African Republic  
Chad  
Chile  
China  
Colombia  
Comoros  
Congo, Republic of the...  
Costa Rica  
Côte d'Ivoire  
Croatia  
Cuba  
Cyprus  
Czech Republic  
Democratic Republic of the Congo  
Djibouti  
Dominica  
Dominican Republic

Ecuador  
Egypt  
El Salvador  
Equatorial Guinea  
Eritrea  
Estonia  
Ethiopia  
Fiji  
Finland  
Gabon  
Gambia  
Georgia  
Ghana  
Greece  
Grenada  
Guatemala  
Guinea  
Guinea-Bissau  
Guyana  
Haiti  
Honduras

Hong Kong (S.A.R.)

Hungary

Iceland

India

Indonesia

Iran

Iraq

Israel

Italy

Jamaica

Jordan

Kazakhstan

Kenya

Kiribati

Kuwait

Kyrgyzstan

Lao People's  
Democratic Republic

Latvia

Lebanon

Lesotho

Liberia

Libyan Arab  
Jamahiriya

Liechtenstein

Lithuania

Luxembourg

Madagascar

Malawi

Malaysia

Maldives

Mali

Malta

Marshall Islands

Mauritania

Mauritius

Micronesia, Federated  
States of...

Monaco

Mongolia

Montenegro

Morocco

Mozambique

Myanmar

Namibia  
Nauru  
Nepal  
Nicaragua  
Niger  
Nigeria  
North Korea  
Norway  
Oman  
Pakistan  
Palau  
Panama  
Papua New Guinea  
Paraguay  
Peru  
Philippines  
Poland  
Portugal  
Qatar  
Republic of Moldova  
-

Romania  
Russian Federation  
Rwanda  
Saint Kitts and Nevis  
Saint Lucia  
Saint Vincent and the Grenadines  
Samoa  
San Marino  
Sao Tome and Principe  
Saudi Arabia  
Senegal  
Serbia  
Seychelles  
Sierra Leone  
Singapore  
Slovakia  
Slovenia  
Solomon Islands  
Somalia  
South Africa  
South Korea

Spain

Sri Lanka

Sudan

Suriname

Swaziland

Syrian Arab Republic

Tajikistan

Thailand

The former Yugoslav Republic of Macedonia

Timor-Leste

Togo

Tonga

Trinidad and Tobago

Tunisia

Turkey

Turkmenistan

Tuvalu

Uganda

Ukraine

United Arab Emirates

United Kingdom of Great Britain and Northern Ireland





Field	Choice Count
United States of America	71% 87
Japan	9% 11
Canada	3% 4
Germany	3% 4
France	2% 3
Ireland	2% 2
Netherlands	2% 3
Switzerland	2% 2
Austria	1% 1
Belgium	1% 1
Denmark	1% 1
Mexico	1% 1
New Zealand	1% 1
Sweden	1% 1

Field	Choice Count
Afghanistan	0% 0
Albania	0% 0
Algeria	0% 0
Andorra	0% 0
Angola	0% 0
Antigua and Barbuda	0% 0
Argentina	0% 0
Armenia	0% 0
Australia	0% 0
Azerbaijan	0% 0
Bahamas	0% 0
Bahrain	0% 0
Bangladesh	0% 0
Barbados	0% 0
Belarus	0% 0
Belize	0% 0
Benin	0% 0
Bhutan	0% 0
Bolivia	0% 0
Bosnia and Herzegovina	0% 0
Botswana	0% 0
Brazil	0% 0
Brunei Darussalam	0% 0
Bulgaria	0% 0
Burkina Faso	0% 0
Burundi	0% 0
Cambodia	0% 0
Cameroon	0% 0
Cape Verde	0% 0

Field	Choice Count
Central African Republic	0% 0
Chad	0% 0
Chile	0% 0
China	0% 0
Colombia	0% 0
Comoros	0% 0
Congo, Republic of the...	0% 0
Costa Rica	0% 0
Côte d'Ivoire	0% 0
Croatia	0% 0
Cuba	0% 0
Cyprus	0% 0
Czech Republic	0% 0
Democratic Republic of the Congo	0% 0
Djibouti	0% 0
Dominica	0% 0
Dominican Republic	0% 0
Ecuador	0% 0
Egypt	0% 0
El Salvador	0% 0
Equatorial Guinea	0% 0
Eritrea	0% 0
Estonia	0% 0
Ethiopia	0% 0
Fiji	0% 0
Finland	0% 0
Gabon	0% 0
Gambia	0% 0
Georgia	0% 0

Field	Choice Count
Ghana	0% 0
Greece	0% 0
Grenada	0% 0
Guatemala	0% 0
Guinea	0% 0
Guinea-Bissau	0% 0
Guyana	0% 0
Haiti	0% 0
Honduras	0% 0
Hong Kong (S.A.R.)	0% 0
Hungary	0% 0
Iceland	0% 0
India	0% 0
Indonesia	0% 0
Iran	0% 0
Iraq	0% 0
Israel	0% 0
Italy	0% 0
Jamaica	0% 0
Jordan	0% 0
Kazakhstan	0% 0
Kenya	0% 0
Kiribati	0% 0
Kuwait	0% 0
Kyrgyzstan	0% 0
Lao People's Democratic Republic	0% 0
Latvia	0% 0
Lebanon	0% 0
Lesotho	0% 0

Field	Choice Count
Liberia	0% 0
Libyan Arab Jamahiriya	0% 0
Liechtenstein	0% 0
Lithuania	0% 0
Luxembourg	0% 0
Madagascar	0% 0
Malawi	0% 0
Malaysia	0% 0
Maldives	0% 0
Mali	0% 0
Malta	0% 0
Marshall Islands	0% 0
Mauritania	0% 0
Mauritius	0% 0
Micronesia, Federated States of...	0% 0
Monaco	0% 0
Mongolia	0% 0
Montenegro	0% 0
Morocco	0% 0
Mozambique	0% 0
Myanmar	0% 0
Namibia	0% 0
Nauru	0% 0
Nepal	0% 0
Nicaragua	0% 0
Niger	0% 0
Nigeria	0% 0
North Korea	0% 0
Norway	0% 0

Field	Choice Count
Oman	0% 0
Pakistan	0% 0
Palau	0% 0
Panama	0% 0
Papua New Guinea	0% 0
Paraguay	0% 0
Peru	0% 0
Philippines	0% 0
Poland	0% 0
Portugal	0% 0
Qatar	0% 0
Republic of Moldova	0% 0
Romania	0% 0
Russian Federation	0% 0
Rwanda	0% 0
Saint Kitts and Nevis	0% 0
Saint Lucia	0% 0
Saint Vincent and the Grenadines	0% 0
Samoa	0% 0
San Marino	0% 0
Sao Tome and Principe	0% 0
Saudi Arabia	0% 0
Senegal	0% 0
Serbia	0% 0
Seychelles	0% 0
Sierra Leone	0% 0
Singapore	0% 0
Slovakia	0% 0
Slovenia	0% 0

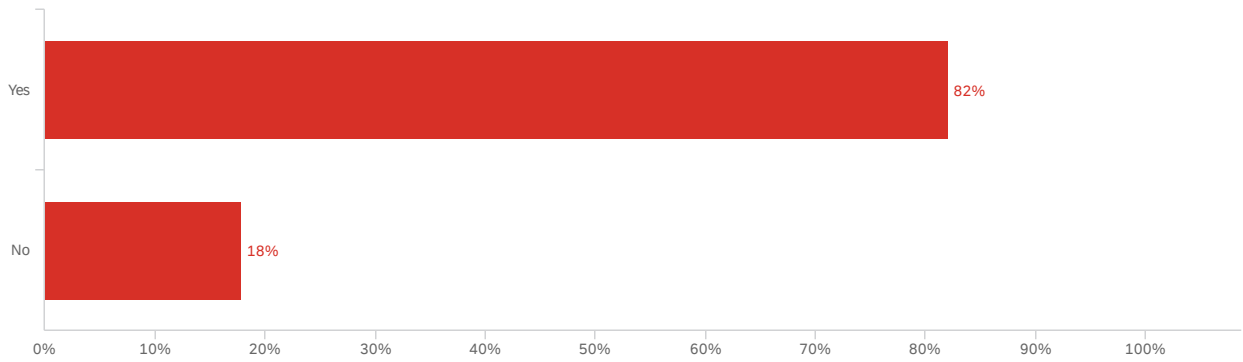
Field	Choice Count
Solomon Islands	0% 0
Somalia	0% 0
South Africa	0% 0
South Korea	0% 0
Spain	0% 0
Sri Lanka	0% 0
Sudan	0% 0
Suriname	0% 0
Swaziland	0% 0
Syrian Arab Republic	0% 0
Tajikistan	0% 0
Thailand	0% 0
The former Yugoslav Republic of Macedonia	0% 0
Timor-Leste	0% 0
Togo	0% 0
Tonga	0% 0
Trinidad and Tobago	0% 0
Tunisia	0% 0
Turkey	0% 0
Turkmenistan	0% 0
Tuvalu	0% 0
Uganda	0% 0
Ukraine	0% 0
United Arab Emirates	0% 0
United Kingdom of Great Britain and Northern Ireland	0% 0
United Republic of Tanzania	0% 0
Uruguay	0% 0
Uzbekistan	0% 0
Vanuatu	0% 0

Field	Choice Count
Venezuela, Bolivarian Republic of...	0% 0
Viet Nam	0% 0
Yemen	0% 0
Zambia	0% 0
Zimbabwe	0% 0
122	

Showing rows 1 - 194 of 194



### Q8 - Does your company act as an importer of record into the US? (select one)



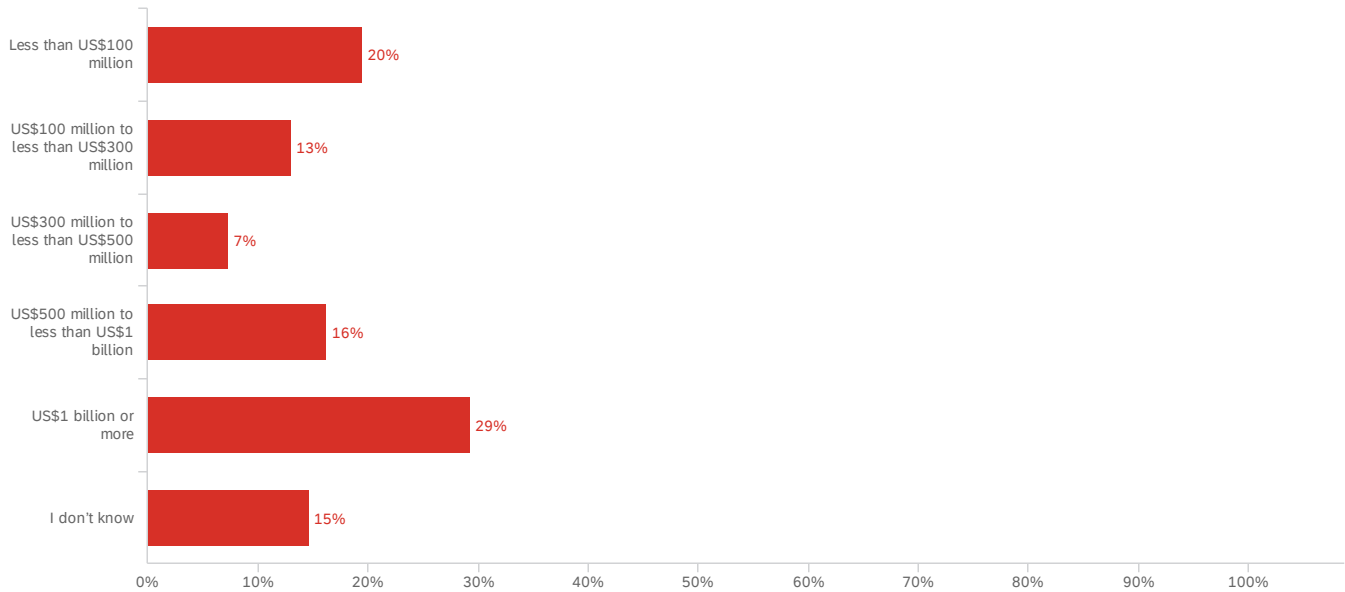
Field	Choice	Count
Yes	82%	101
No	18%	22

123

Showing rows 1 - 3 of 3

## Q9 - What is the approximate total customs value of your organization's imports into the

United States annually (US dollars)? (select one)



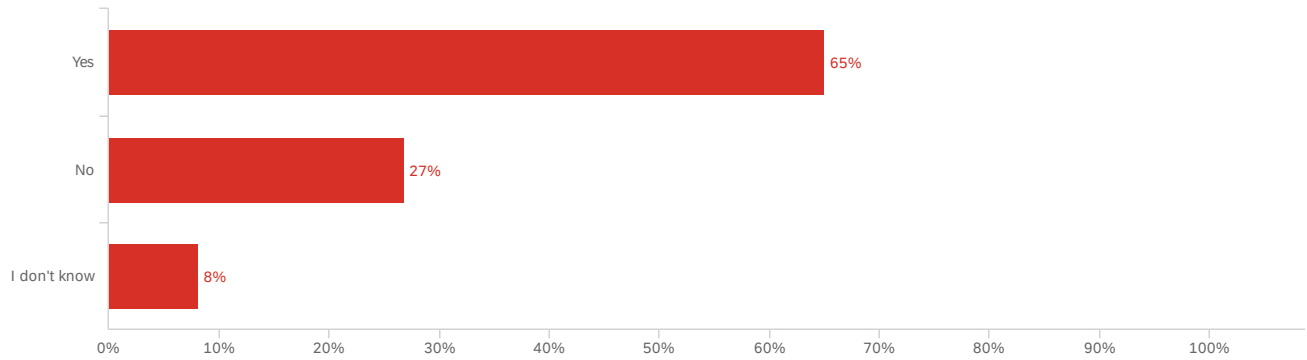
Field	Choice Count
Less than US\$100 million	20% 24
US\$100 million to less than US\$300 million	13% 16
US\$300 million to less than US\$500 million	7% 9
US\$500 million to less than US\$1 billion	16% 20
US\$1 billion or more	29% 36
I don't know	15% 18

123

Showing rows 1 - 7 of 7

# Q10 - Are you a member of US Custom's Customs Trade Partnership Against Terrorism

(CTPAT)? (select one)

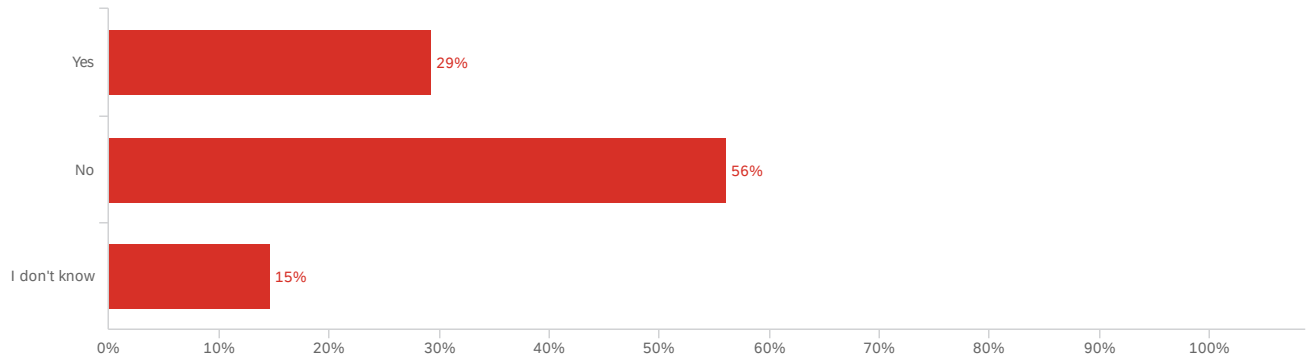


Field	Choice	Count
Yes	65%	80
No	27%	33
I don't know	8%	10
		123

Showing rows 1 - 4 of 4

# Q11 - Are you a member of US Custom's Customs Trade Partnership Against Terrorism

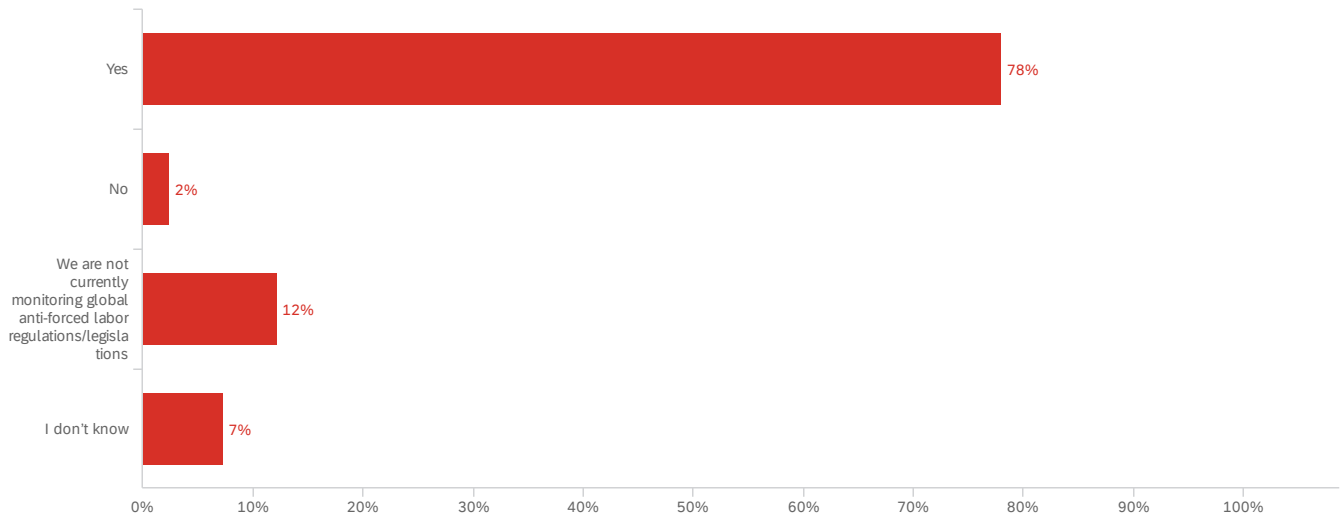
Trade Compliance Program (formerly known as Importer Self-Assessment (ISA))? (select one)



Field	Choice	Count
Yes	29%	36
No	56%	69
I don't know	15%	18
		123

Showing rows 1 - 4 of 4

### Q13 - Do you monitor Global legislation impacting forced labor? (select one)

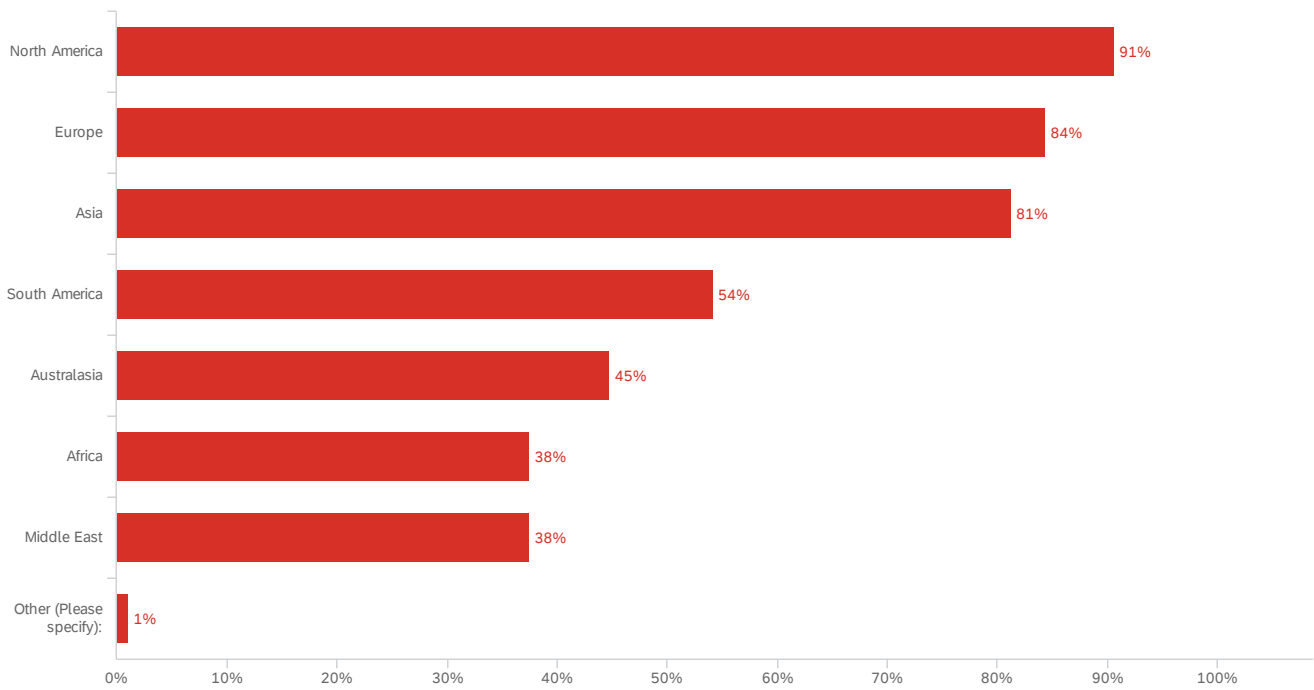


Field	Choice	Count
Yes	78%	96
No	2%	3
We are not currently monitoring global anti-forced labor regulations/legislations	12%	15
I don't know	7%	9

123

Showing rows 1 - 5 of 5

## Q14 - What regions are you monitoring? (select all that apply)



Field	Choice Count
North America	91% 87
Europe	84% 81
Asia	81% 78
South America	54% 52
Australasia	45% 43
Middle East	38% 36
Africa	38% 36
Other (Please specify):	1% 1

96

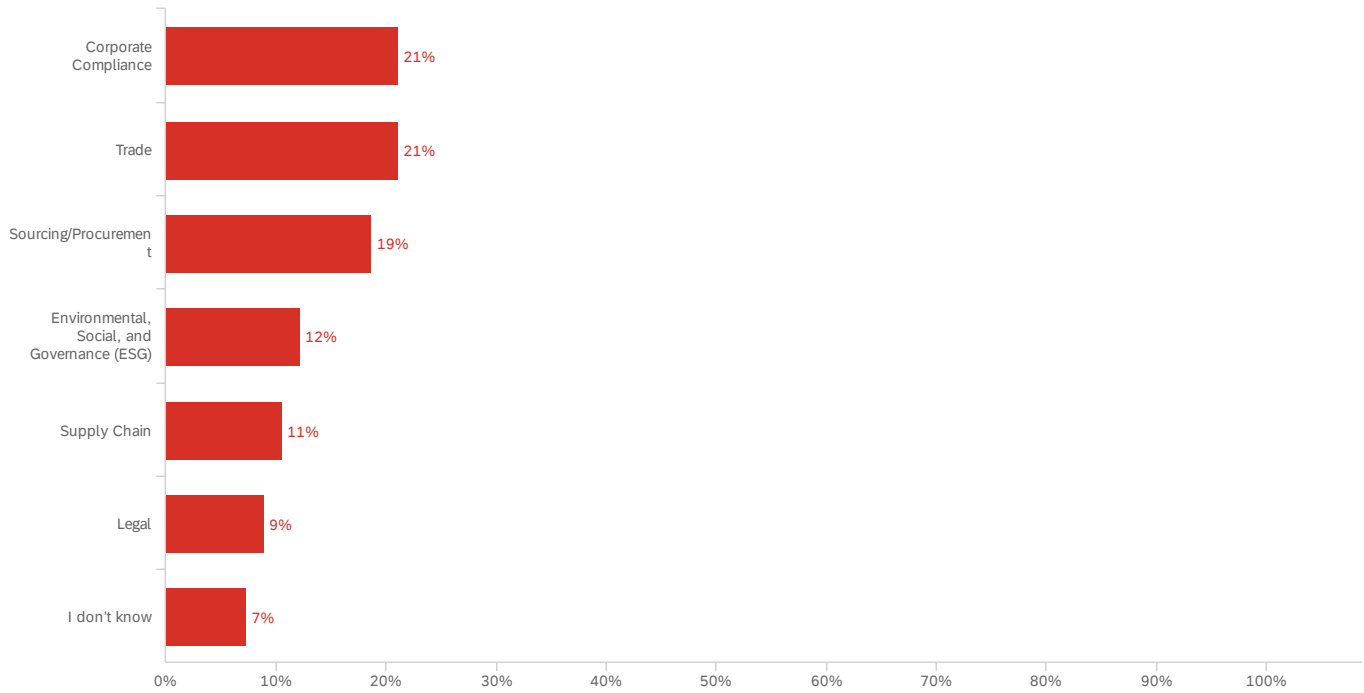
Showing rows 1 - 9 of 9

Q14\_17\_TEXT - Other (Please specify):

Other (Please specify):

Mexico

Q15 - Within your organization, which of the following has primary responsibility for executing the Uyghur Forced Labor Prevention Act (UFLPA)? (select one)

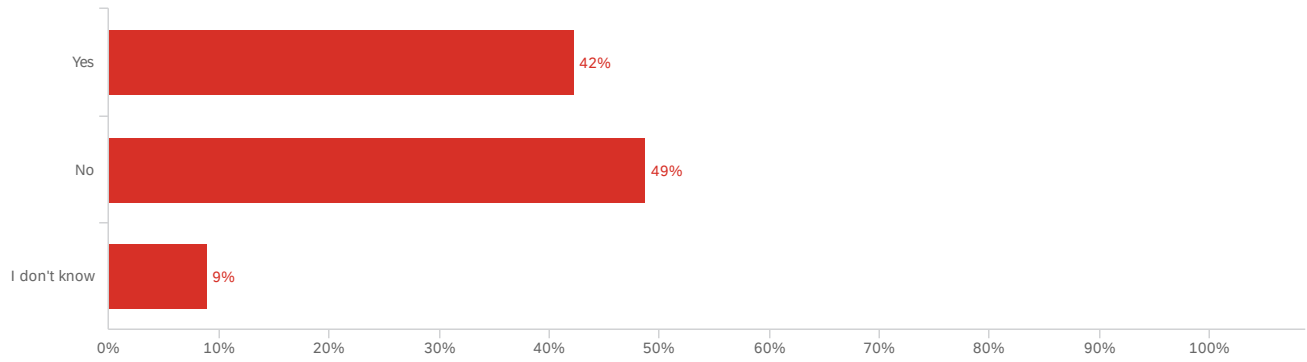


Field	Choice Count
Trade	21% 26
Corporate Compliance	21% 26
Sourcing/Procurement	19% 23
Environmental, Social, and Governance (ESG)	12% 15
Supply Chain	11% 13
Legal	9% 11
I don't know	7% 9
<b>123</b>	

Showing rows 1 - 8 of 8

# Q16 - Do you currently have an Anti-Forced Labor Task Force/Steering Committee?

(select one)



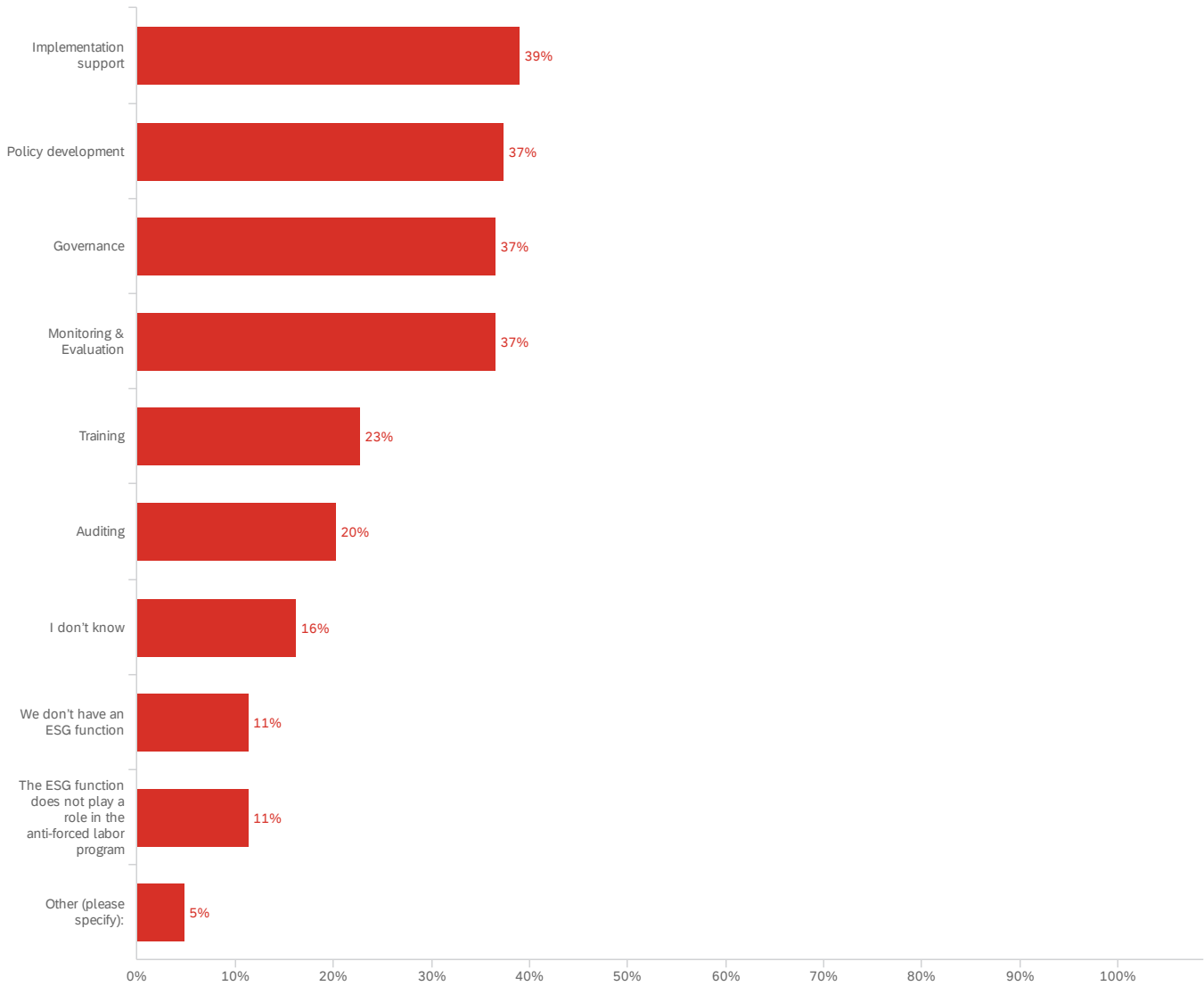
Field	Choice Count
Yes	42% 52
No	49% 60
I don't know	9% 11
123	

Showing rows 1 - 4 of 4



## Q17 - What role, if any, does your organization's Environmental, Social, and Governance

(ESG) function play in managing the anti-forced labor program? (select all that apply)



Field	Choice Count
Implementation support	39% 48
Policy development	37% 46
Monitoring & Evaluation	37% 45
Governance	37% 45
Training	23% 28
Auditing	20% 25

Field	Choice Count
I don't know	16% 20
The ESG function does not play a role in the anti-forced labor program	11% 14
We don't have an ESG function	11% 14
Other (please specify):	5% 6

123

Showing rows 1 - 11 of 11

Q17\_6\_TEXT - Other (please specify):

Other (please specify):

Investor Relations Comms.

Partnering in all of the above

Reporting in ESG Report only

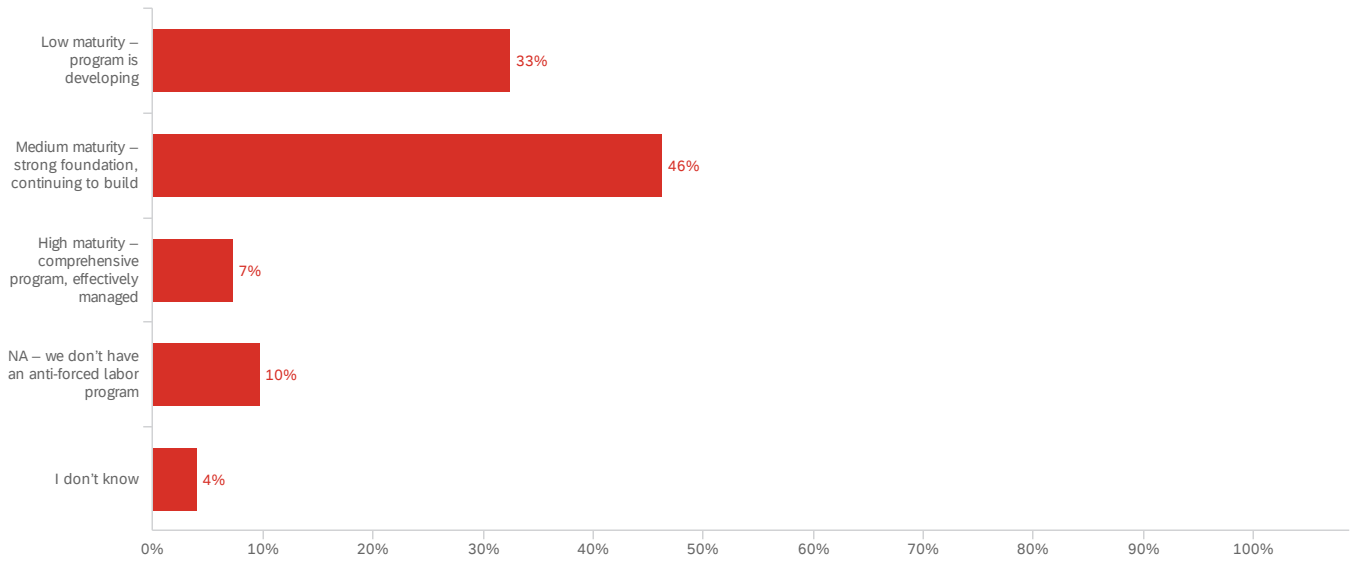
Target setting

legal

suppliers tracking

## Q18 - How would you rate the maturity of your organization's anti-forced labor program?

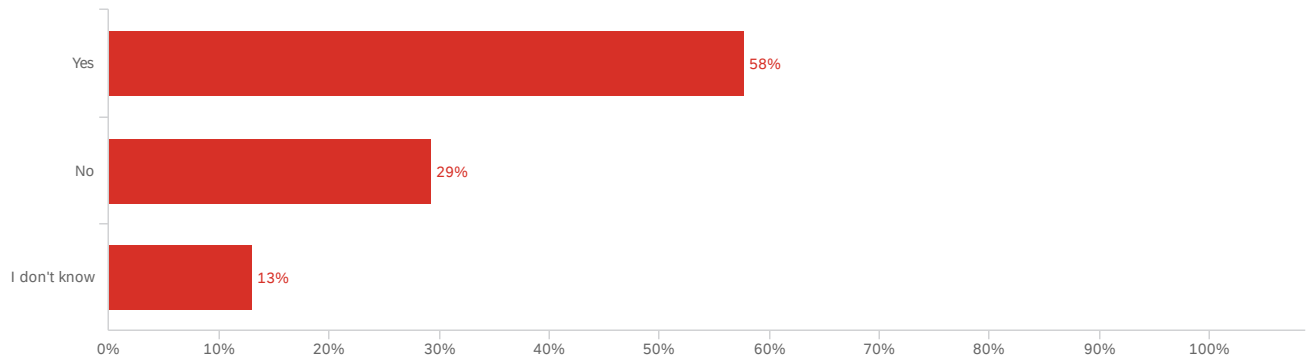
(select one)



Field	Choice	Count
Low maturity – program is developing	33%	40
Medium maturity – strong foundation, continuing to build	46%	57
High maturity – comprehensive program, effectively managed	7%	9
NA – we don't have an anti-forced labor program	10%	12
I don't know	4%	5
		123

Showing rows 1 - 6 of 6

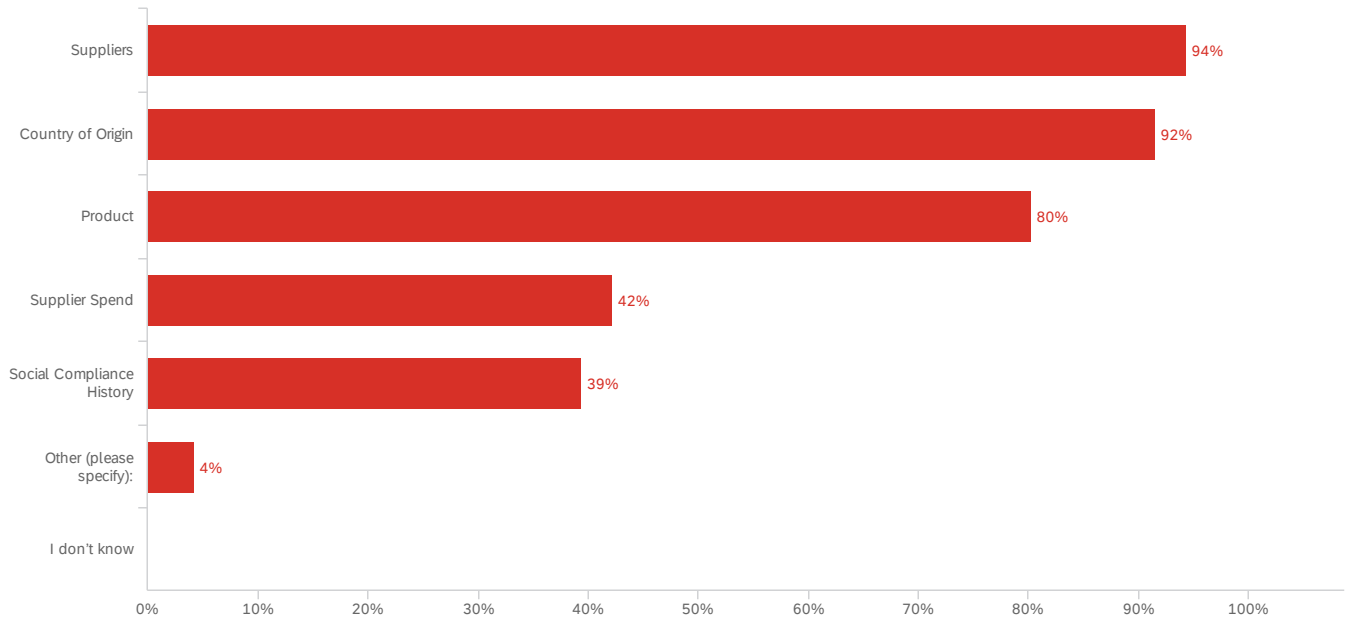
### Q19 - Does your organization carry out UFLPA risk assessments? (select one)



Field	Choice	Count
Yes	58%	71
No	29%	36
I don't know	13%	16
		123

Showing rows 1 - 4 of 4

Q20 - Which of the following factors does your organization analyze when carrying out UFLPA risk assessments? (select all that apply)



Field	Choice Count
Suppliers	94% 67
Country of Origin	92% 65
Product	80% 57
Supplier Spend	42% 30
Social Compliance History	39% 28
Other (please specify):	4% 3
I don't know	0% 0
	71

Showing rows 1 - 8 of 8

Q20\_8\_TEXT - Other (please specify):

Other (please specify):

Import volume+value from CN

all entity lists

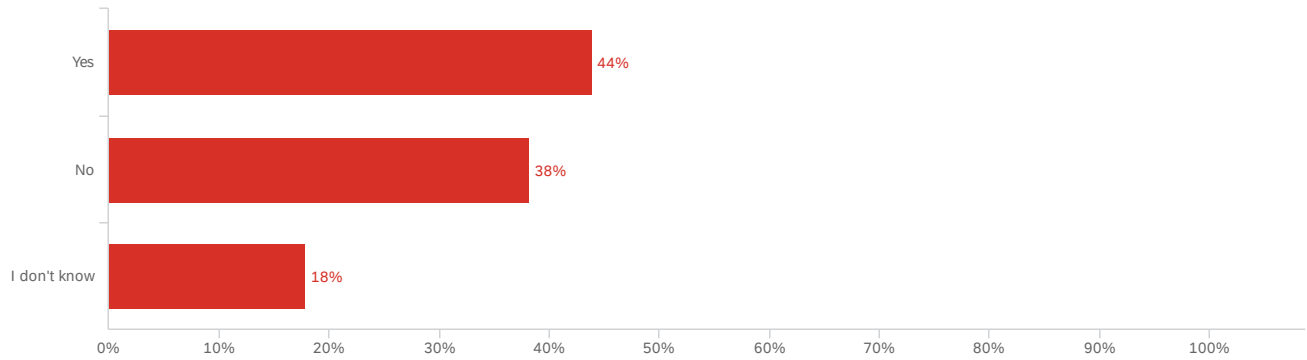
Other (please specify):



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product genomes / principle mining of elements and minerals

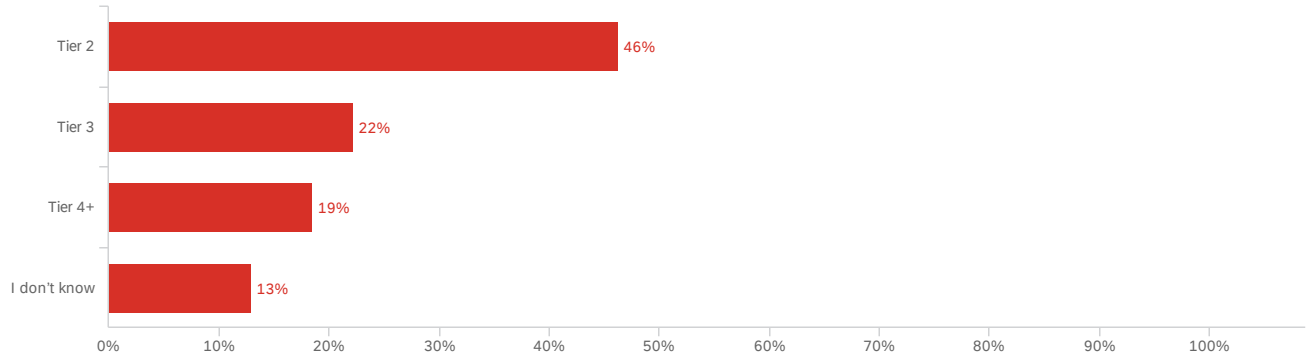
Q21 - Does your organization collect supplier information beyond a tier 1 level? (select one)



Field	Choice Count
Yes	44% 54
No	38% 47
I don't know	18% 22
123	

Showing rows 1 - 4 of 4

Q22 - Through which of the following Tier levels does your organization collect information? (select one)

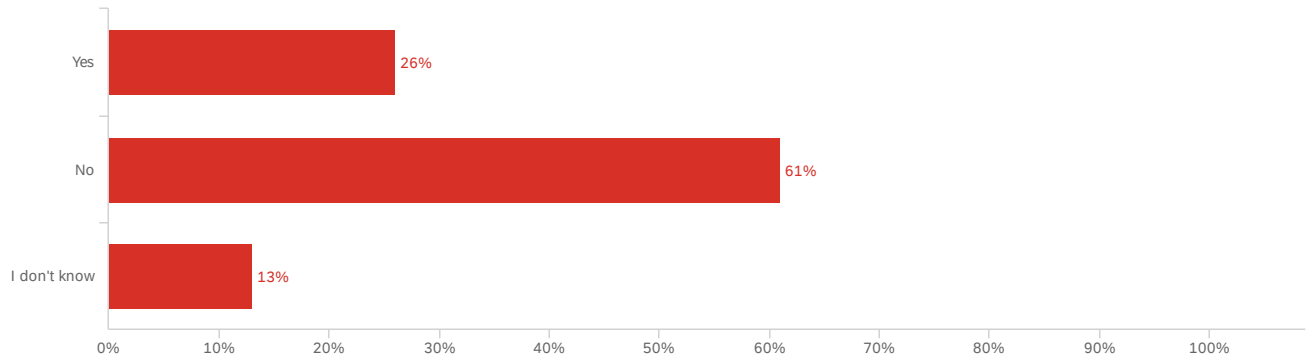


Field	Choice Count
Tier 2	46% 25
Tier 3	22% 12
Tier 4+	19% 10
I don't know	13% 7
	54

Showing rows 1 - 5 of 5



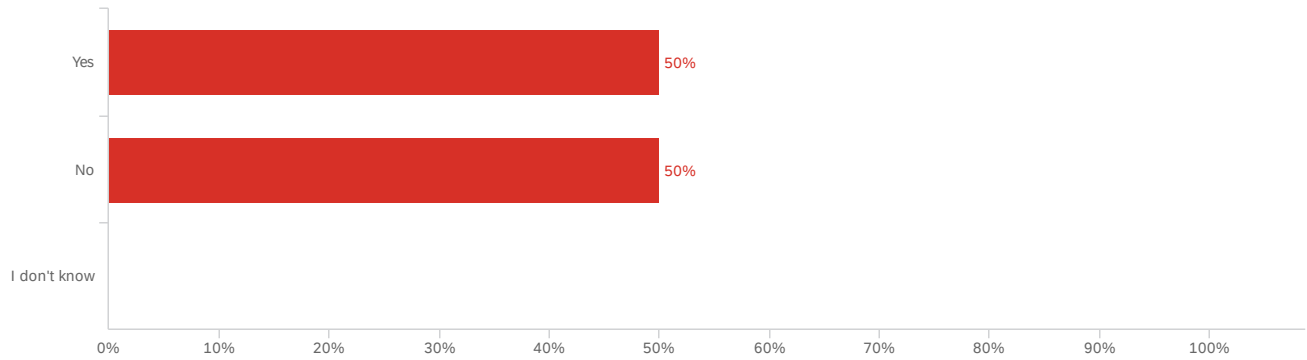
Q23 - Does your organization carry out mock supply chain audits (e.g., simulating a response to a US Customs applicability review)? (select one)



Field	Choice Count
Yes	26% 32
No	61% 75
I don't know	13% 16
123	

Showing rows 1 - 4 of 4

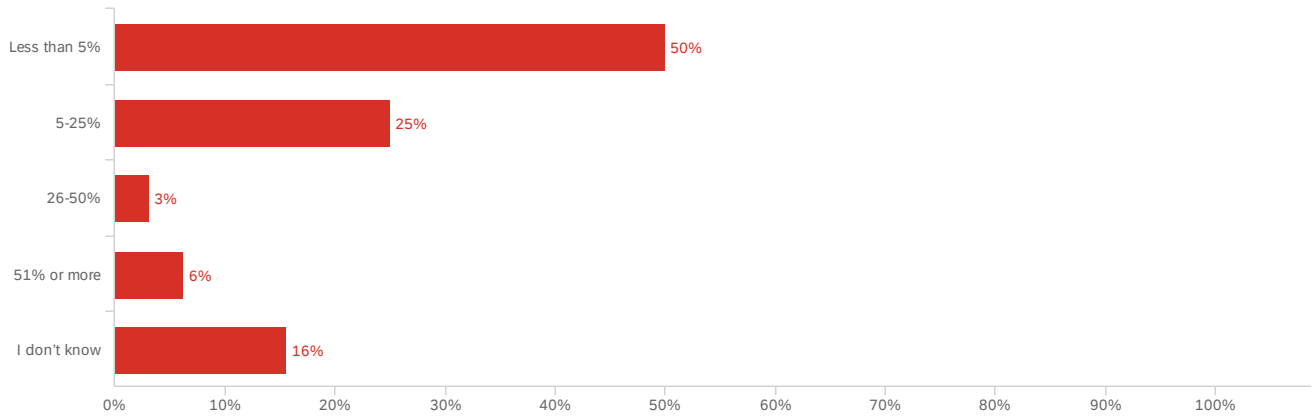
Q24 - Does your organization use external providers to carry out the mock supply chain audits? (select one)



Field	Choice Count
Yes	50% 16
No	50% 16
I don't know	0% 0
32	

Showing rows 1 - 4 of 4

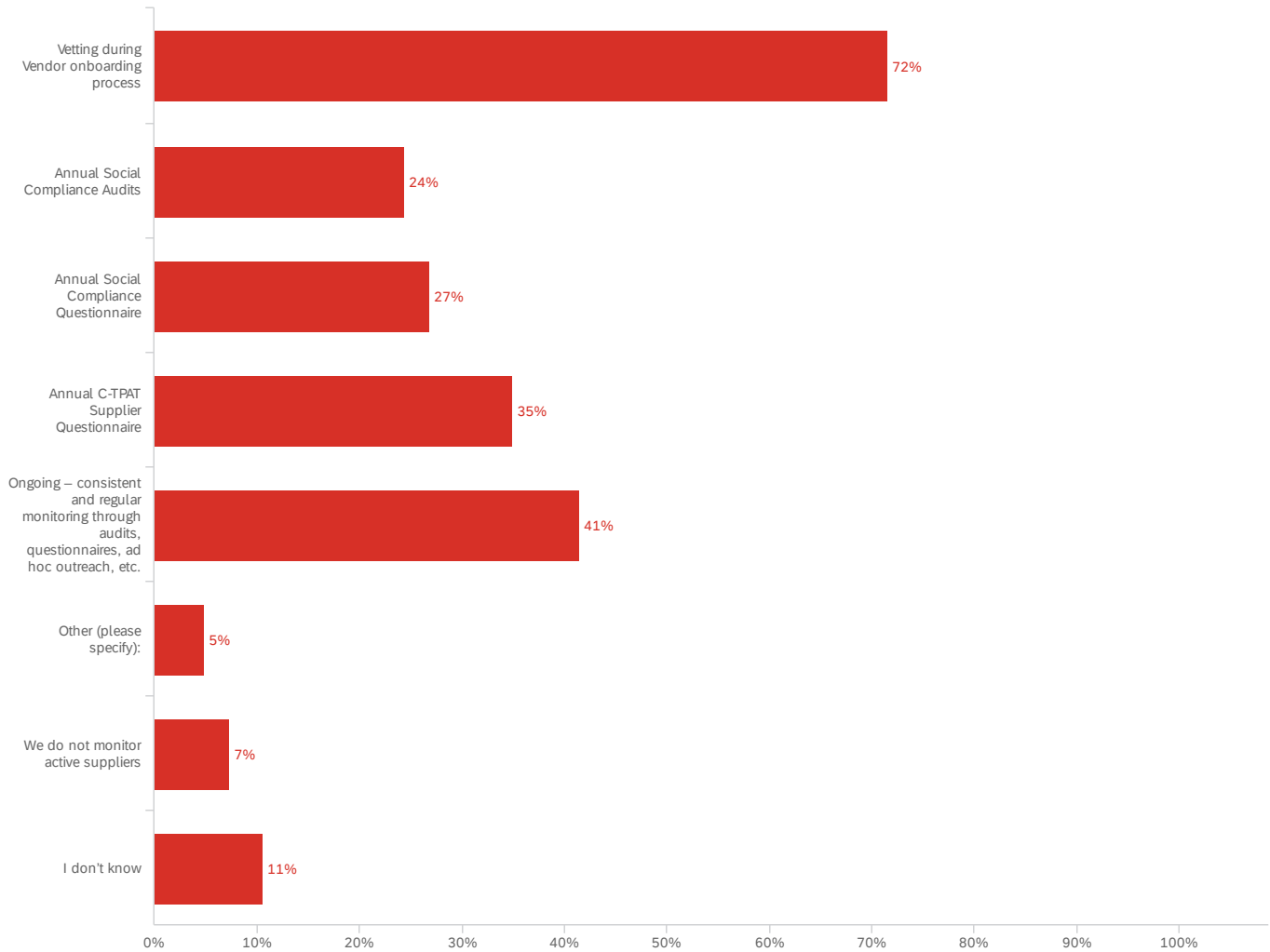
Q25 - What percentage of your organization's suppliers go through the mock supply chain audits? (select one)



Field	Choice Count
Less than 5%	50% 16
5-25%	25% 8
26-50%	3% 1
51% or more	6% 2
I don't know	16% 5
	32

Showing rows 1 - 6 of 6

Q26 - At what point(s) does your organization monitor active suppliers, specific to supply chain labor practices? (select all that apply)



Field	Choice Count
Vetting during Vendor onboarding process	72% 88
Annual Social Compliance Audits	24% 30
Annual Social Compliance Questionnaire	27% 33
Annual C-TPAT Supplier Questionnaire	35% 43
Ongoing – consistent and regular monitoring through audits, questionnaires, ad hoc outreach, etc.	41% 51
Other (please specify):	5% 6
We do not monitor active suppliers	7% 9

Field

Choice  
Count

I don't know

11% 13

123

Showing rows 1 - 9 of 9

Q26\_13\_TEXT - Other (please specify):

Other (please specify):

Initiating FL project to contact 'at risk' suppliers

On-going screening against lists

Regular Supplier Screening using a tool which includes forced labor

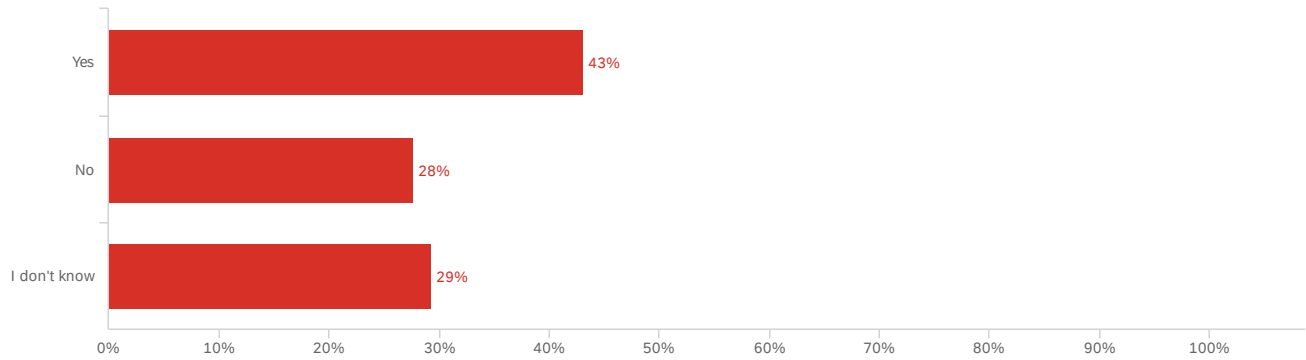
Use of a suppliers dashboard

annually

initiating monitoring activity

## Q27 - Does your organization review suppliers using the International Labour

Organization's forced labor indicators? (select one; if you click on the link a new tab in your browser will open)

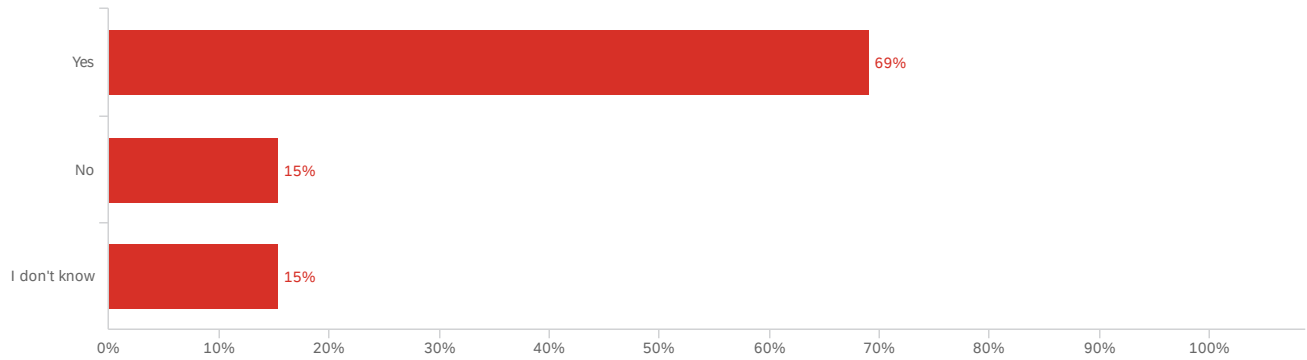


Field	Choice	Count
Yes	43%	53
No	28%	34
I don't know	29%	36
		123

Showing rows 1 - 4 of 4

Q28 - Does your organization carry out Anti-forced labor entity screening against the

UFLPA Entity List? (select one; if you click on the link a new tab in your browser will open)

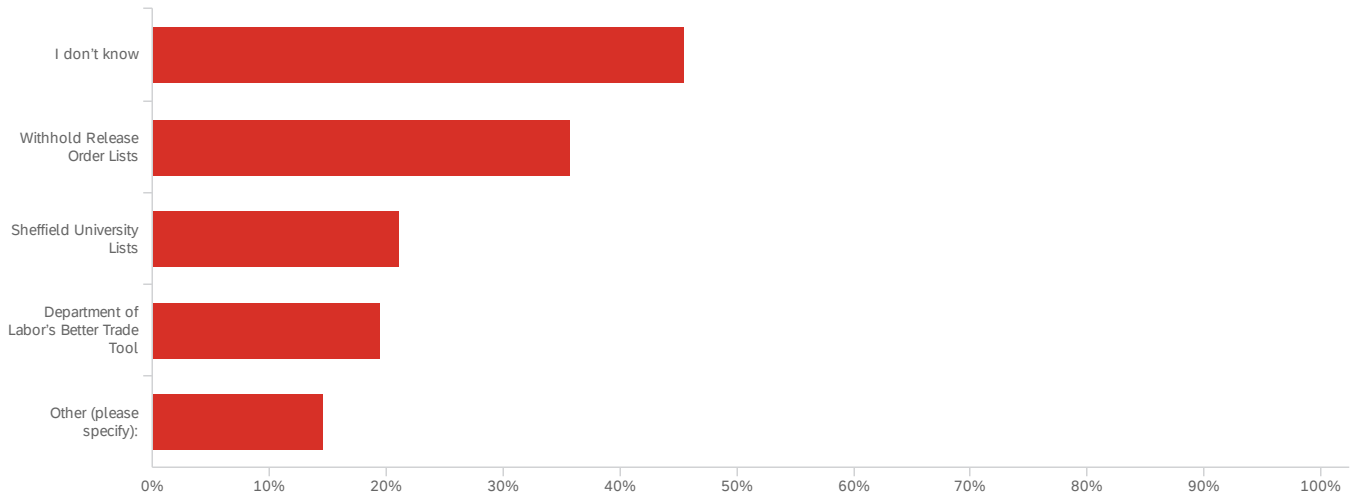


Field	Choice Count
Yes	69% 85
No	15% 19
I don't know	15% 19
123	

Showing rows 1 - 4 of 4

## Q29 - Which of the following lists does your organization screen against beyond the

UFLPA entity list? (select all that apply)



Field	Choice Count
I don't know	46% 56
Withhold Release Order Lists	36% 44
Sheffield University Lists	21% 26
Department of Labor's Better Trade Tool	20% 24
Other (please specify):	15% 18
	123

Showing rows 1 - 6 of 6

Q29\_7\_TEXT - Other (please specify):

Other (please specify):

ASPI, The Information, UHRP, FEDREG, Reuters, KHARON

Currently looking to see if there is a global watch list that can be referenced. Any insight to this?

Dow Jones DPS

Dow Jones Risk and Compliance

Multiple lists (SPL, Sanctions, Export Control)



Other (please specify):

Not screening at all

RPLs

Thomson Reuters Global Trade Management DPS lists

Thomson-Reuters

US - DHS, Uyghur Forced Labor Prevention Act (Entity List) ,

Various lists for export controls

We use Thomson Reuters OneSource powered by IntegrationPoint for screening

internal Cotton suppliers list

none

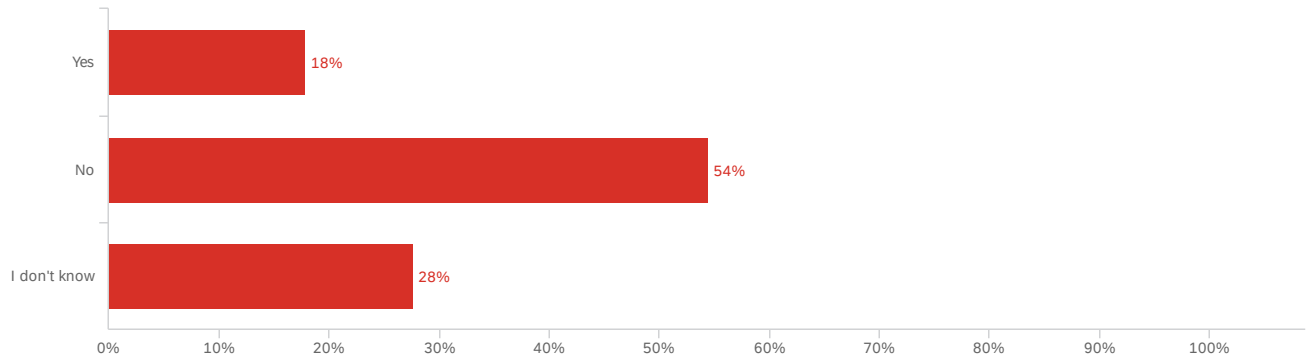
none

none of these

not automated besides UFLPA list

restricted party sanctions list

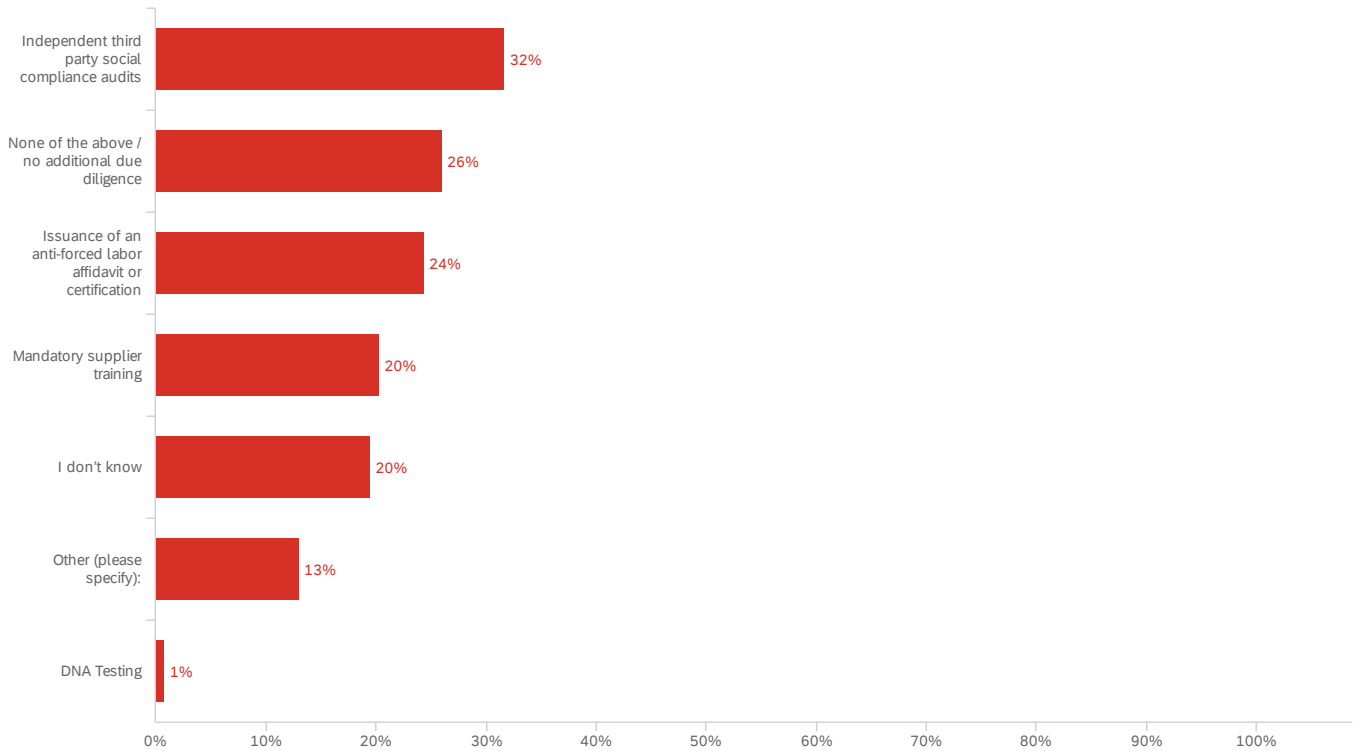
Q30 - Has your organization terminated relationships with any suppliers due to forced labor concerns? (select one)



Field	Choice	Count
Yes	18%	22
No	54%	67
I don't know	28%	34
		123

Showing rows 1 - 4 of 4

Q31 - What additional due diligence is your organization undertaking? (select all that apply)



Field	Choice Count
Independent third party social compliance audits	32% 39
None of the above / no additional due diligence	26% 32
Issuance of an anti-forced labor affidavit or certification	24% 30
Mandatory supplier training	20% 25
I don't know	20% 24
Other (please specify):	13% 16
DNA Testing	1% 1
	123

Showing rows 1 - 8 of 8

Q31\_7\_TEXT - Other (please specify):

Other (please specify):



Other (please specify):

AI Supply Chain Mapping

AI and ML risk monitoring

BCORP

Building out deep dive processes for highest risk suppliers

Collecting FL documents from 'at risk' suppliers, additional screening, calls with suppliers

FCPA

Reviewing software solutions, but no decisions made yet

Slavery Trafficking Risk Template Survey to suppliers

Strengthening current governance, incorporation into CTPAT screening program

Supplier Scorecards

Supply Chain Mapping

We are in the process of identifying a mapping process provider.

initiating due diligence

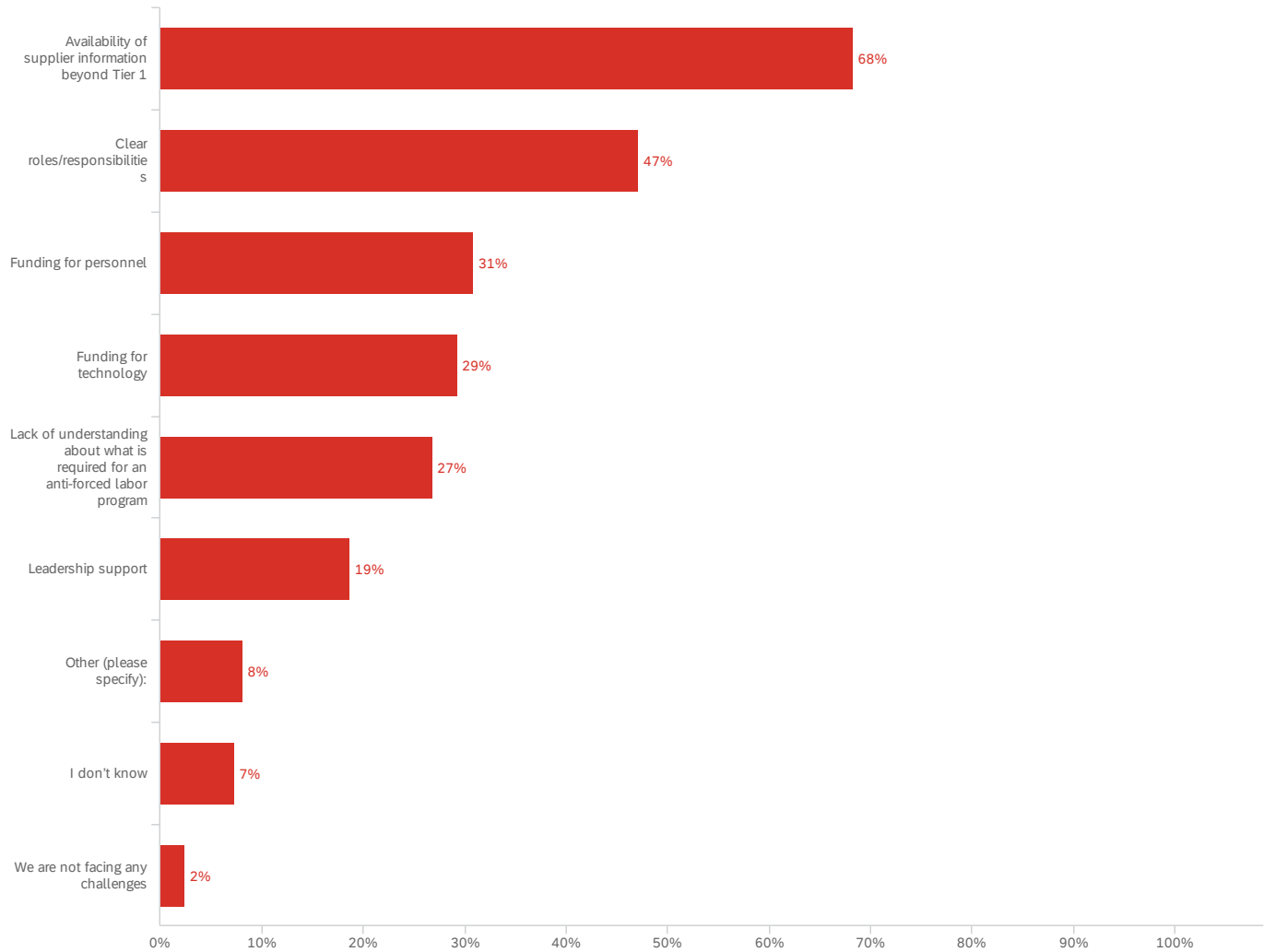
newsletters, email notifications

published a forced labor policy to suppliers

supply chain mapping

## Q32 - What are the top challenges to building out your organization's anti-forced labor

program? (select up to 3)



Field	Choice Count
Availability of supplier information beyond Tier 1	68% 84
Clear roles/responsibilities	47% 58
Funding for personnel	31% 38
Funding for technology	29% 36
Lack of understanding about what is required for an anti-forced labor program	27% 33
Leadership support	19% 23
Other (please specify):	8% 10

Field	Choice Count
I don't know	7% 9
We are not facing any challenges	2% 3
	123

Showing rows 1 - 10 of 10

Q32\_21\_TEXT - Other (please specify):

Other (please specify):

Geopolitical sensitivities

Lack of clarity from government authorities regarding enforcement (e.g., US Customs)

Linking Tier 3 to higher risk commodities and tracking UFLPA labor that may be traded throughout China

Most of our suppliers are domestically based

PRC law

Priorities

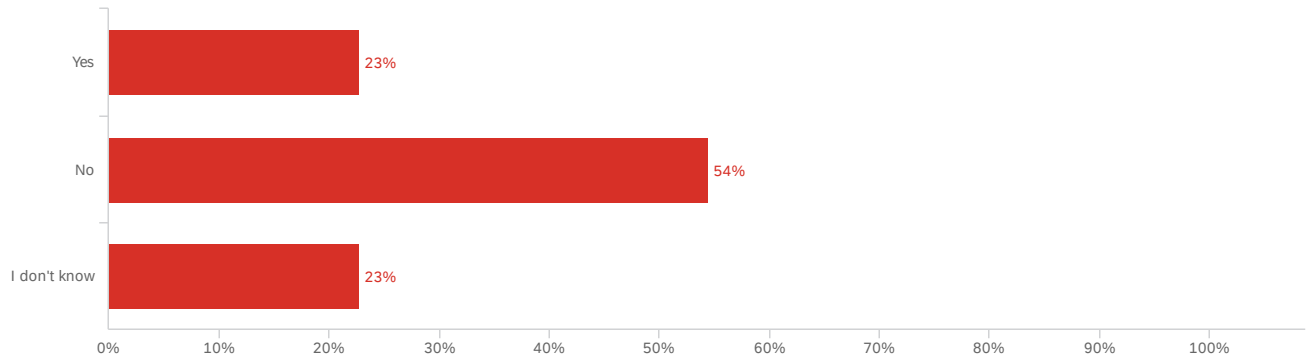
Supplier Education

navigating CN anti trust / counter-espionage law

time to implement

trying to insure program covers all current global programs

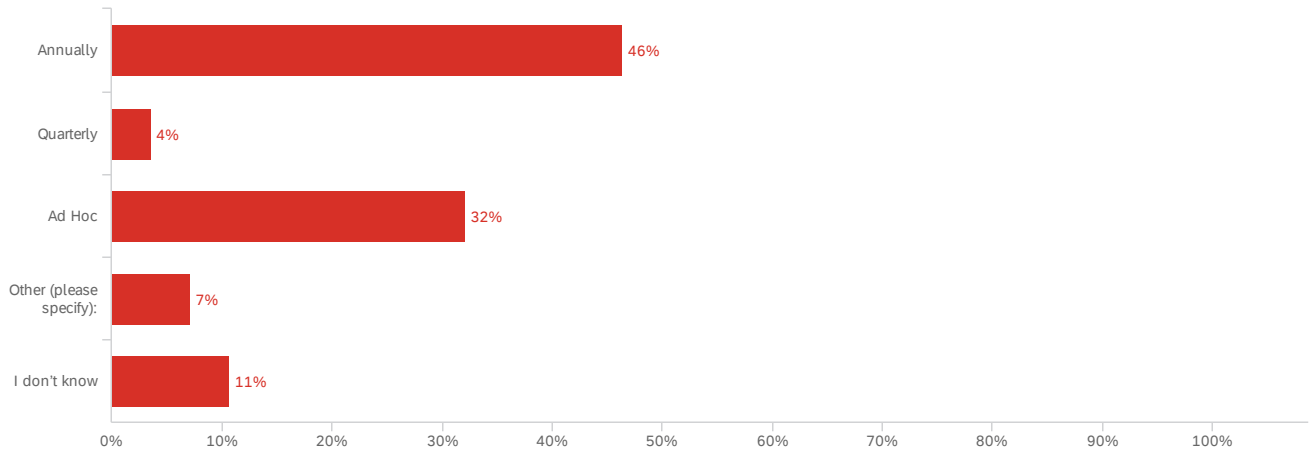
Q33 - Does your organization conduct anti-forced labor training for suppliers? (select one)



Field	Choice Count
Yes	23% 28
No	54% 67
I don't know	23% 28
123	

Showing rows 1 - 4 of 4

Q34 - How often does your organization conduct anti-forced labor training for external suppliers? (select one)



Field	Choice Count
Annually	46% 13
Quarterly	4% 1
Ad Hoc	32% 9
Other (please specify):	7% 2
I don't know	11% 3
	28

Showing rows 1 - 6 of 6

Q34\_7\_TEXT - Other (please specify):

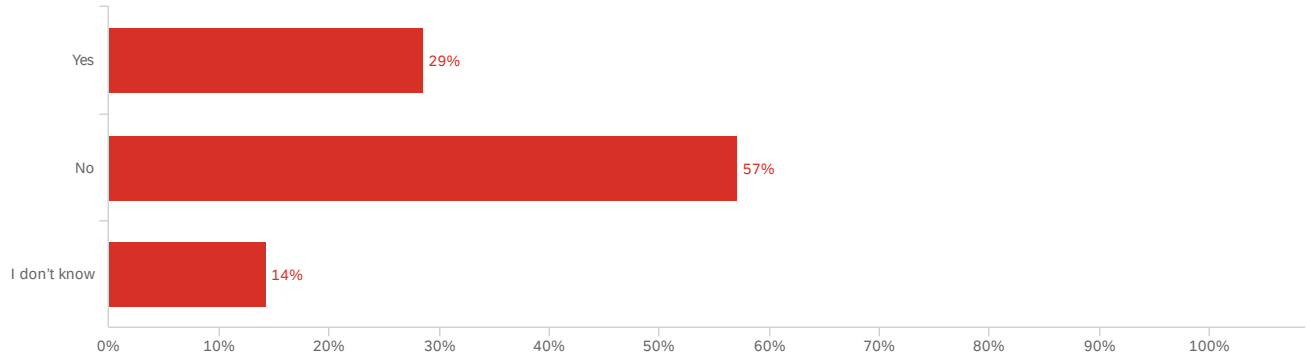
Other (please specify):

at onboarding, every 3 yrs thereafter

via suppliers risk assessments



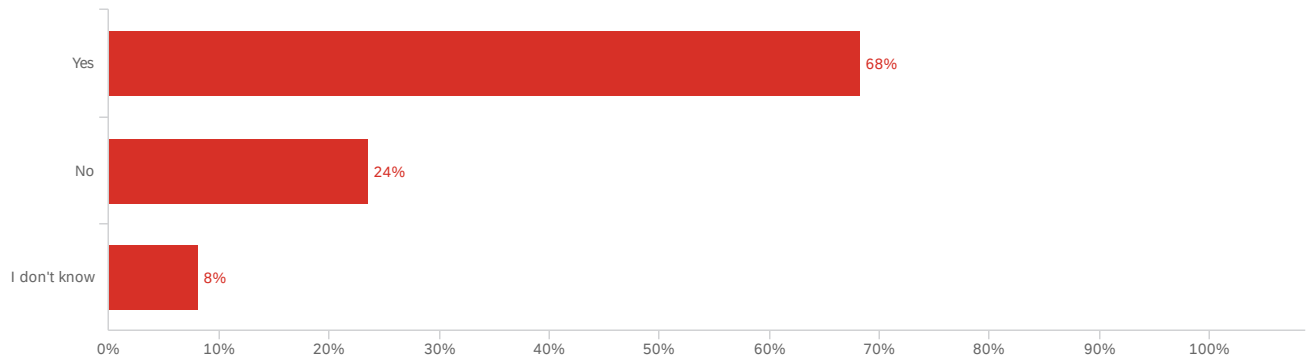
Q35 - Does your organization conduct training separately for Chinese entities? (select one)



Field	Choice Count
Yes	29% 8
No	57% 16
I don't know	14% 4
28	

Showing rows 1 - 4 of 4

### Q36 - Does your organization carry out internal training for employees? (select one)

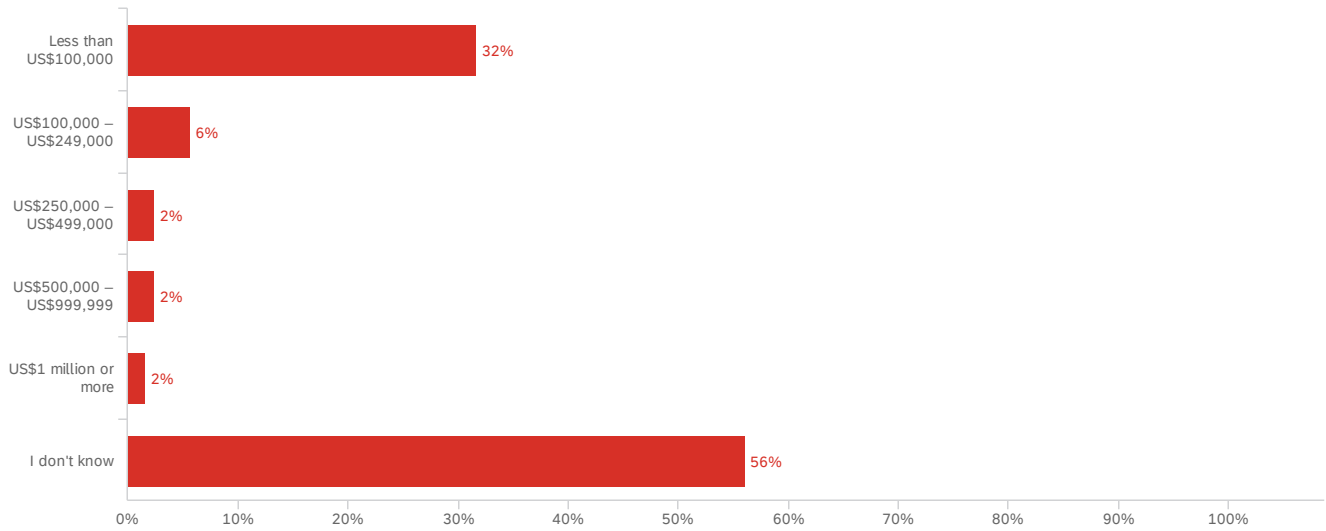


Field	Choice Count
Yes	68% 84
No	24% 29
I don't know	8% 10
123	

Showing rows 1 - 4 of 4

# Q37 - What is your organization's annual budget (in US dollars) for UFLPA compliance?

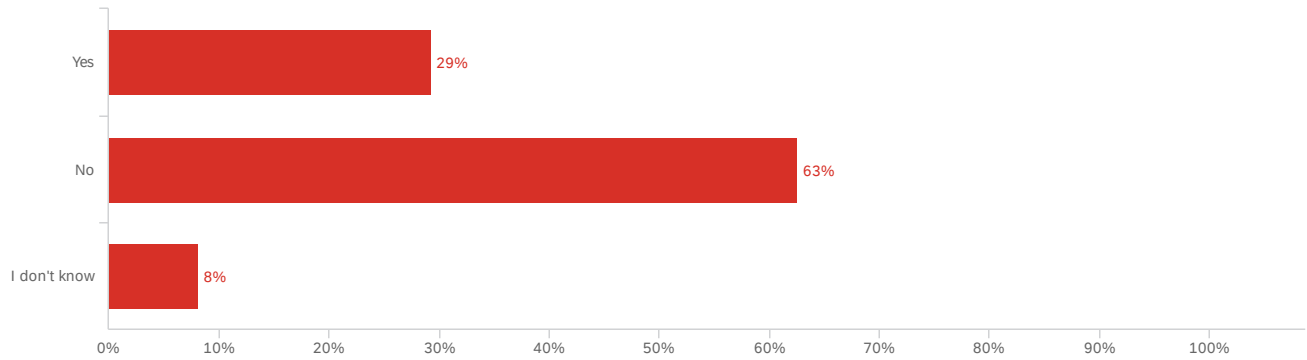
(select one)



Field	Choice Count
Less than US\$100,000	32% 39
US\$100,000 – US\$249,000	6% 7
US\$250,000 – US\$499,000	2% 3
US\$500,000 – US\$999,999	2% 3
US\$1 million or more	2% 2
I don't know	56% 69

# Q38 - Does your organization have headcount dedicated to Anti-Forced Labor

compliance? (select one)

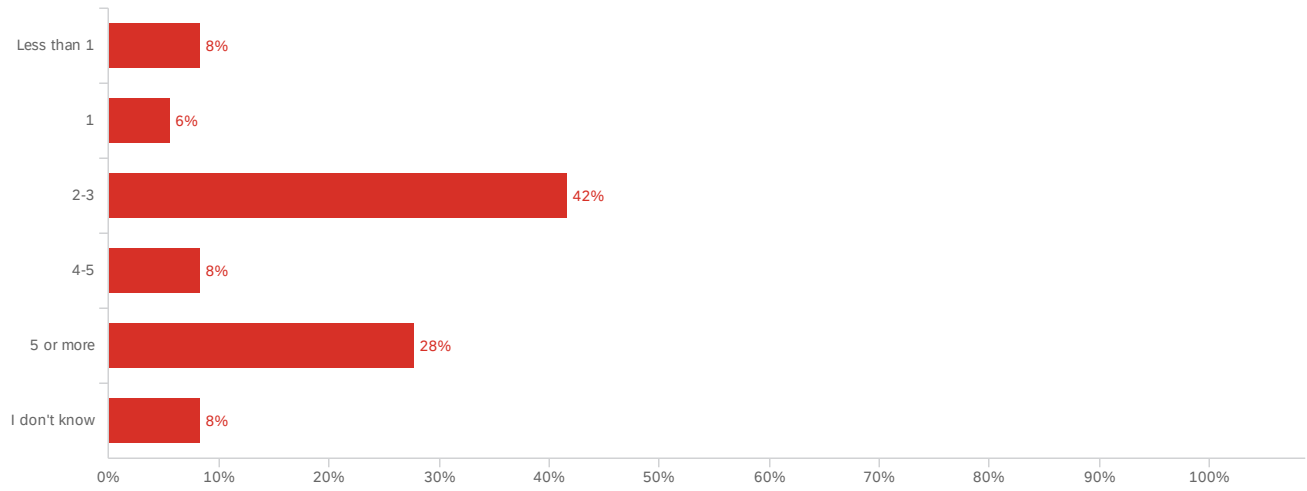


Field	Choice Count
Yes	29% 36
No	63% 77
I don't know	8% 10
123	

Showing rows 1 - 4 of 4

## Q39 - Approximately how many full-time employees (FTEs) support anti-forced labor

compliance at your organization? (select one)



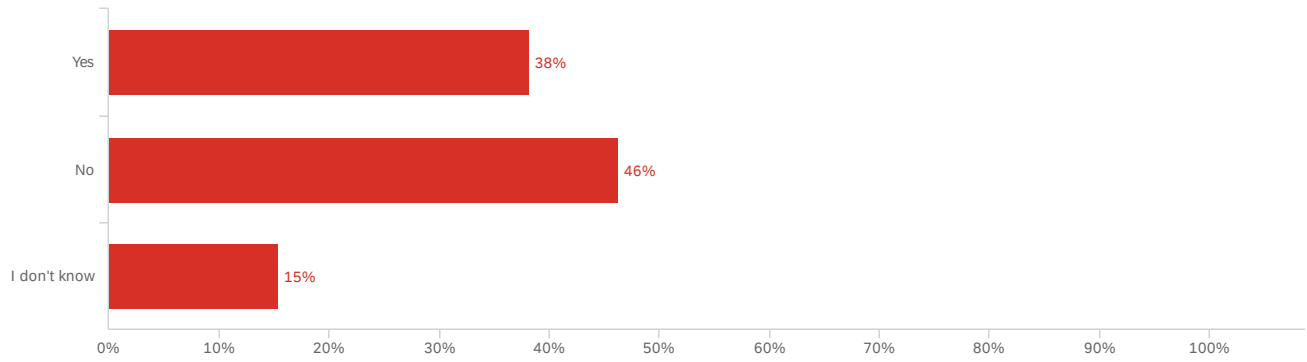
Field	Choice Count
Less than 1	8% 3
1	6% 2
2-3	42% 15
4-5	8% 3
5 or more	28% 10
I don't know	8% 3

36

Showing rows 1 - 7 of 7

# Q40 - Does your organization use automation to support compliance with the UFLPA?

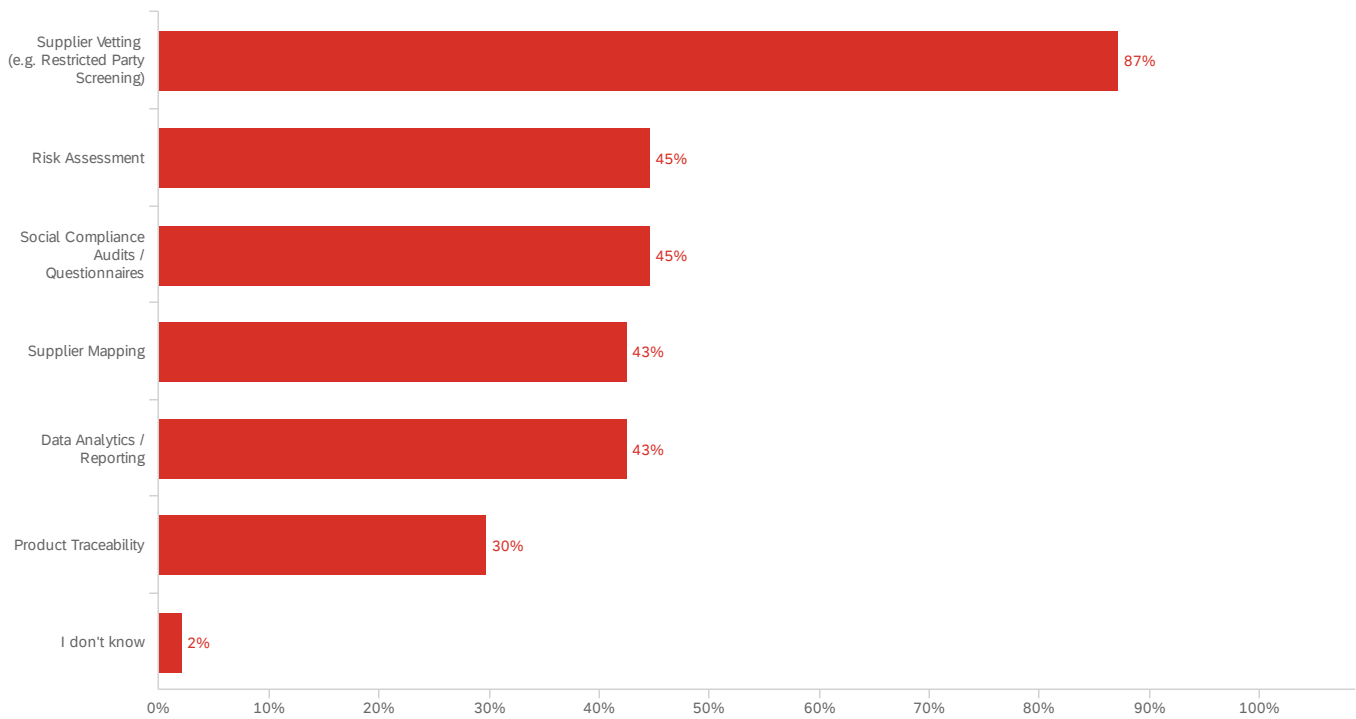
(select one)



Field	Choice Count
Yes	38% 47
No	46% 57
I don't know	15% 19
123	

Showing rows 1 - 4 of 4

## Q41 - How is your organization using automation? (select all that apply)



Field	Choice Count
Supplier Vetting (e.g. Restricted Party Screening)	41
Social Compliance Audits / Questionnaires	21
Risk Assessment	21
Data Analytics / Reporting	20
Supplier Mapping	20
Product Traceability	14
I don't know	1
	47

Showing rows 1 - 8 of 8

Q42 - What specific automation tools or platforms is your organization using? (please specify; optional)

What specific automation tools or platforms is your organization using? (p...

Assent

At the current time, we use Descartes MK Denial

Descartes

ERP system

Everstream Analytics

FRDM

In house developed tools. Evaluating external platforms currently.

One Trust, CMAP

Restricted Party Screening tool.

SAP GTS Restricted Party Screening

Sayari; Assent

SourceMap

TR OneSource for DPS/RPS TR CLEAR for enhanced risk screening

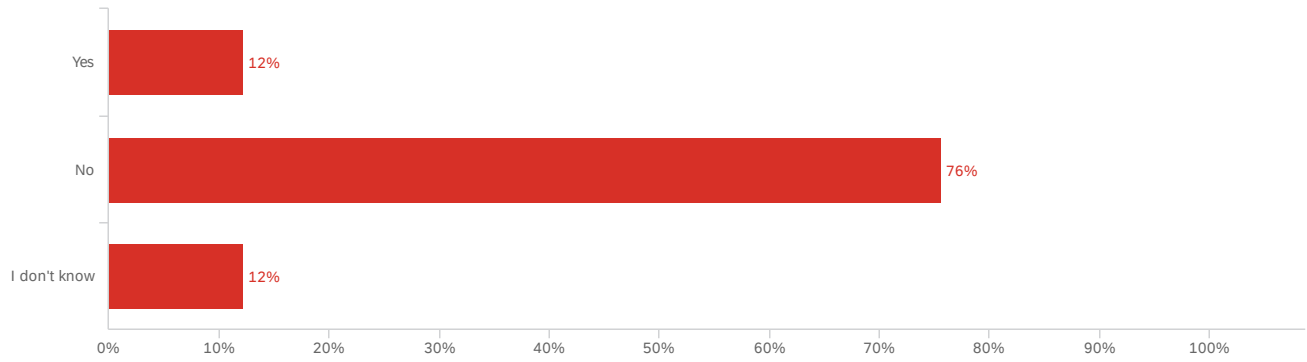
Tradesphere; BlueUmbrella

third party portals with surveys/ questionnaires and analytics for internal discussions.



# Q43 - Has your organization been issued an inquiry by US Customs relating to Forced

Labor? (select one)

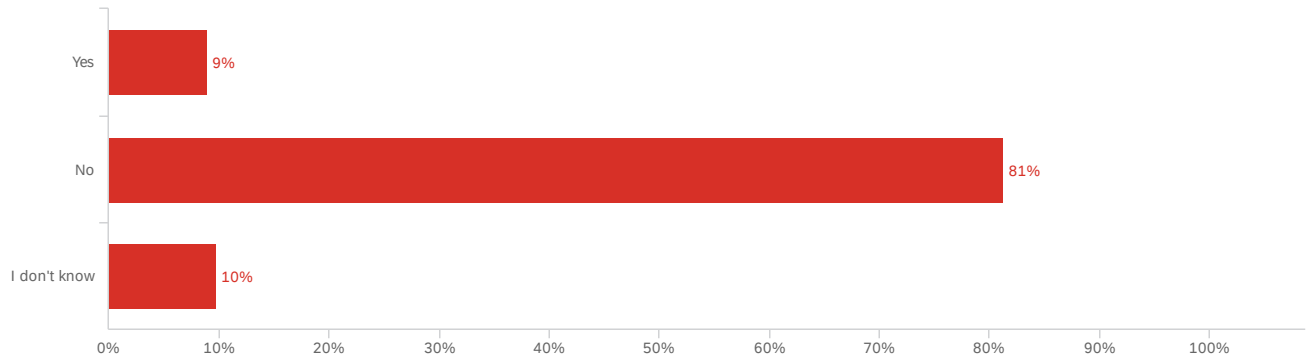


Field	Choice Count
Yes	12% 15
No	76% 93
I don't know	12% 15
123	

Showing rows 1 - 4 of 4

# Q44 - Has your organization been issued a detention notice or seizure of goods

associated with Forced Labor? (select one)

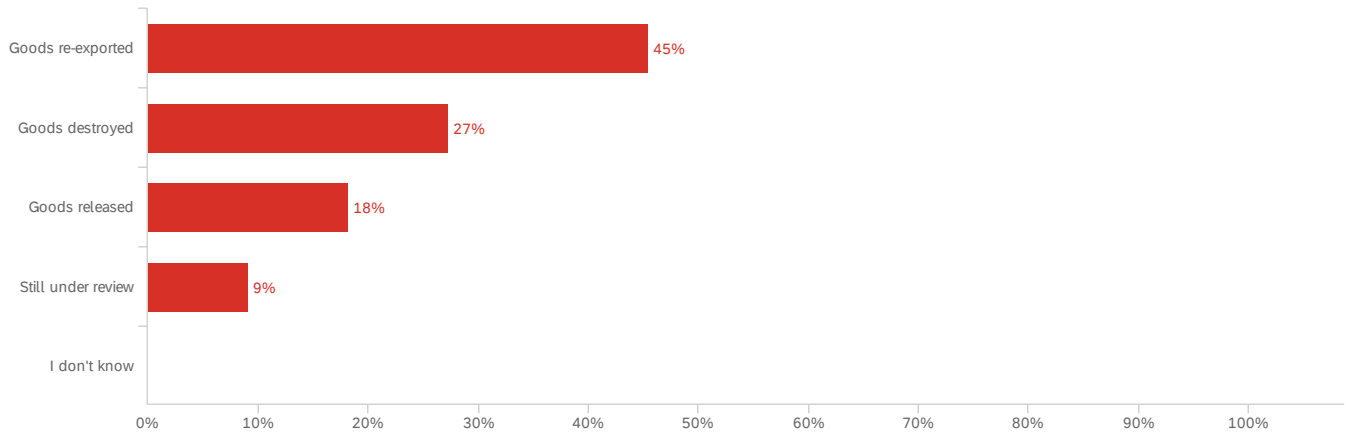


Field	Choice Count
Yes	9% 11
No	81% 100
I don't know	10% 12
123	

Showing rows 1 - 4 of 4

# Q45 - What was the resolution related to the detention notice/seizure of goods issued?

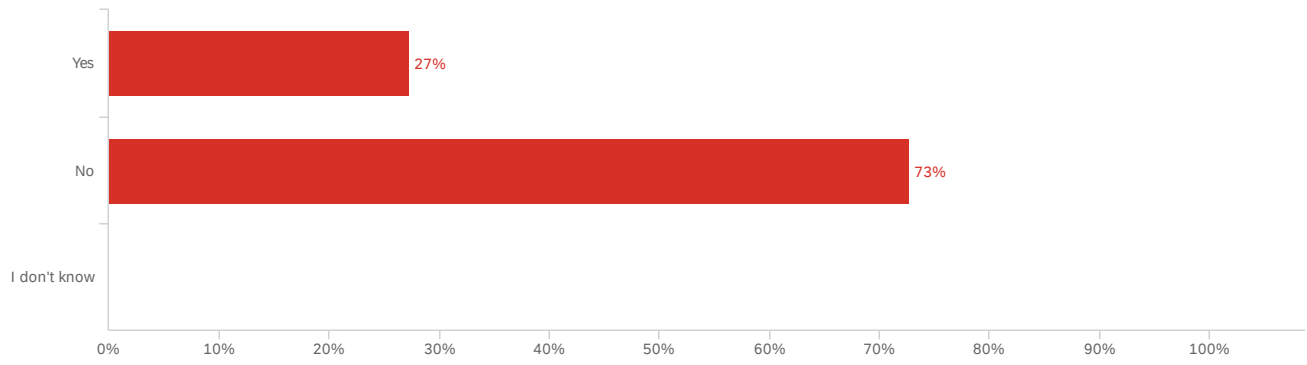
(select one)



Field	Choice Count
Goods re-exported	45% 5
Goods destroyed	27% 3
Goods released	18% 2
Still under review	9% 1
I don't know	0% 0
	11

Showing rows 1 - 6 of 6

Q46 - Were the subject goods located in a Foreign Trade Zone (FTZ)? (select one)



Field	Choice	Count
Yes	27%	3
No	73%	8
I don't know	0%	0
		11

Showing rows 1 - 4 of 4

## Q47 - What additional guidance would you like to see from US Customs? (please describe; optional)

What additional guidance would you like to see from US Customs? (please de...  
▼

Acceptable documentation for proof of no forced labor;

Best practices in industry (if any)

Clarity

Clear instructions on due diligence requirements

Clearer tier level requirements/expectations

Electronic workflow guidelines for applicability review

Examples of requirements

Further clarity about what would be required if goods were stopped. Understanding whether our pro-active efforts will be taken into consideration if our goods were stopped.

Greater transparency on information used to determine forced labor is applicable. True partnership with Trade to tackle this issue.

Guidance that explain the expectations in a clear, consumable format

I would like US Customs to disclose the details of why they stopped the shipment, such as which supplier or activity do they think engaged in forced labor to produce the product.

Information on jizya tax

Limiting the supply chain mapping to the Tier 1 suppliers.

More clarity regarding enforcement approach; the dashboard is useful, but even more transparency would be helpful; communication of realistic timelines for review of importer UFLPA submissions; more clarity regarding suppliers/manufacturers of concern

More data sharing for entities they know are implicated in forced labor activity.

More frequent updates to the Entity List and more transparency from CBP on UFLPA detentions/findings, etc.

More transparency about how determinations are made as to UFLPA applicability.

More transparency of information they use to evaluate supply chain risk

More transparency on foreign entities and products of concern

More transparency on targeted companies

What additional guidance would you like to see from US Customs? (please de...  
▼

N/A

NOT continuously adding new item on the published product target list

OFAC

Quicker and consistent decision making.

Response is quite basic. It would be helpful to actually see what information they needed to release.

Specific guidance on where they know forced labor exists

Specific information for release

The term "forced labour" varies from country to country. In New Zealand, Prison Labour is also deemed forced labour and imports of goods obtained through prison labour are prohibited. However Prison Labour in the USA is not a prohibited activity. Therefore using a global compliance program on forced labour is not going to be consistent

Transparency on their risk rating/review processes, Expectations for industry to managing beyond Tier 2+ suppliers

Update the entity list; separate detention notices in the tool by industry and not solely by CEE. Be forthcoming on what a successful response includes.

a realistic expectation from US Customs on what is needed to prove no use of forced labor--the current standard is not realistic

ability to exchange information before detention...specifics on what CBP is concerned with; open dialogue

additional details/feedback on supply chain mapping expectations. There are numerous software providers out there but few seem to have the capability to fully trace the supply chain - most are still in development

better guidance on what type of documents they want to see to release goods; when goods are released (if ever) what was considered acceptable to prove non-forced labor by CBP

clear guidance on suspected vendors

clear guidance on what is needed to release a detained shipment, recommended tools,

clear information on why a shipment is flagged for detention, button, trim, fabric etc.

continue to publish guidance

forced labor webinars

less stringent guidelines.....some information is impossible to get

regular updated entity lists for all tiers

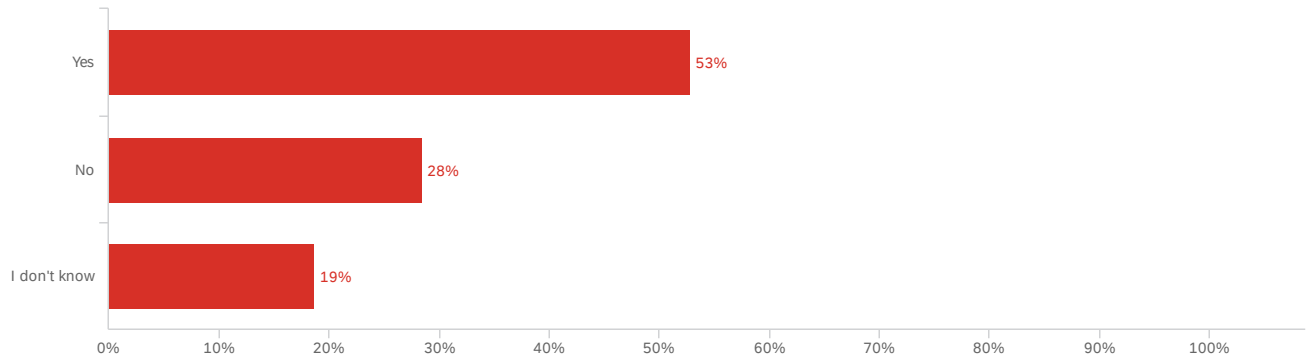
specific details to help industry navigate this complex challenge

What additional guidance would you like to see from US Customs? (please de...  
▼

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transparency on release documentation

Q48 - Is your organization part of one or more industry associations that play a role in anti-forced labor discussions? (select one)



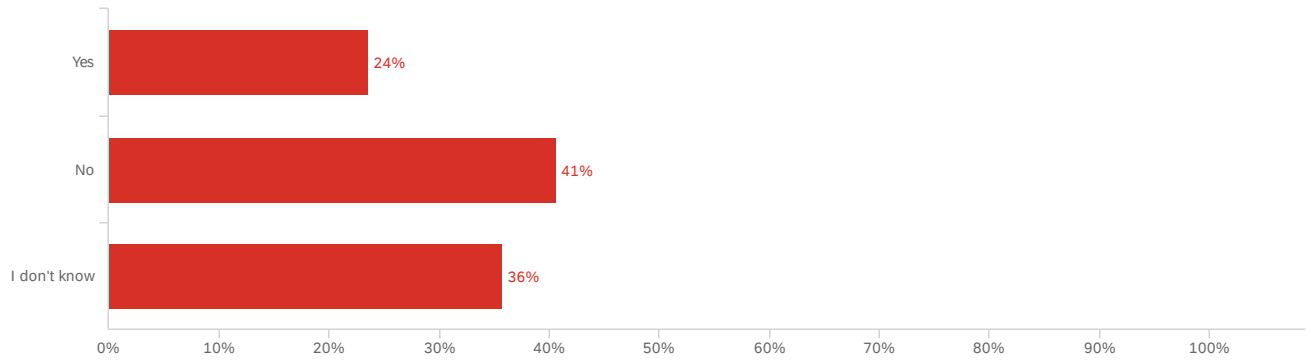
Field	Choice Count
Yes	53% 65
No	28% 35
I don't know	19% 23
123	

Showing rows 1 - 4 of 4



Q49 - Is your organization part of one or more initiatives specific to responsible sourcing or fair labor practices (e.g., Responsible Business Alliance, Fair Labor Association etc.)?

(select one)



Field	Choice Count
Yes	24% 29
No	41% 50
I don't know	36% 44
	123

Showing rows 1 - 4 of 4

Q50 - If you are interested in having a KPMG professional reach out to discuss UFLPA and/or anti-forced labor compliance, please provide your e-mail address below. (optional)

Email:

Adi.shrivastava@novelis.com

BENJAMIN.HALEWICZ@MERCK.COM

alissa.lemler@target.com

brian.seger@kiewit.com

cely.coleman@nitto.com

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**End of Report**

