U.S. Customs and Border Protection

Forced Labor Division
Forced Labor Enforcement

FACT SHEET

Responsible Business Practices on Forced Labor Risk in the Global Supply Chain

To further CBP's strategic goal to stop the importation of goods produced with forced labor, the Office of Trade recommends the Department of Labor Comply Chain principles to create a social compliance system as a best business practice.

Comprehensive Supply Chain Profile

- Does the U. S. importer have a comprehensive understanding of the natural supply chain from sourcing of raw materials to subcontracting manufacturing to the assembly of finished goods destined for the U.S.?
- For their products, has the U.S. importer conducted a comprehensive risk assessment of forced labor in the global supply chain and conducted onsite production visits to the factory, farm, or mine for high-risk countries?
- Is the U.S. importer engaged with industry specific multi-stakeholder initiatives?

Written Code of Conduct

- Has the U.S. importer developed and applied a formal written code of conduct for all international interactions associated with the sourcing of foreign goods?
- Is the code of conduct shared with all suppliers in the global supply chain as a stand-alone document or as addendums to purchase orders, contracts, or letters of credit?
- Does code of conduct include specific language as to minimum labor standards as specified by the United Nations International Labor Organization (ILO), other intergovernmental organizations, or multi-stake holder initiatives?

Robust Internal Control Process

- Are the internal controls established according to professionally recognized objective audit standards?
- Does the U.S. importer have sufficient internal controls in place to effectively deter and detect instances of noncompliance with the code of conduct and other best practices?
- Does the U.S. importer conduct periodic compliance audits using in-house personnel or external audit professionals?
- Does the U.S. importer's internal control process cover every level of the product supply chain including relevant business documents?
- Does the U.S. importer have adequate corrective action plans to address noncompliance and deter weak business practices?

For more information on responsible business guidance see:

The Organisation for Economic Co-operation and Development developed OECD Guidelines for Multinational Enterprises. Recommendations by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognized standards. The guidelines are the only multilaterally and comprehensive code of responsible business conduct that governments have agreed to promote.

Risk Mitigation

1. Engage Stakeholders & Partners
2. Assess Risks & Impacts
3. Develop Code of Conduct
4. Communicate and Train across your Supply Chain

Internal Controls

5. Monitor Compliance
6. Independent Review
7. Remediate Violations
8. Report Performance

CBP PublicationNo.1166-0620