

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.

