



The Uyghur Forced Labor Prevention Act (UFLPA) compliance checklist

The Uyghur Forced Labor Prevention Act (UFLPA) marks a significant shift in global trade and human rights enforcement. This checklist is designed to help you navigate UFLPA requirements, from understanding key provisions to implementing effective compliance strategies.

1. Understand UFLPA Basics

- Understand the “rebuttable presumption” concept
- Review the focus on the Xinjiang Uyghur Autonomous Region (XUAR)
- Check the U.S. government’s “Entity List” for prohibited transactions

2. Identify High-Risk Industries

- Solar:** Polysilicon production in XUAR
- Textiles and Apparel:** Cotton sourcing from XUAR
- Agriculture:** Various products, including tomatoes
- Electronics:** Certain minerals and components

3. Assess Potential Supply Chain Disruptions

- Prepare for possible detentions and seizures by U.S. Customs and Border Protection (CBP)
- Anticipate delays due to increased scrutiny and documentation requirements
- Budget for increased costs related to compliance measures
- Evaluate and mitigate potential reputational risks

4. Implement Compliance Strategies

4.1 Supply Chain Mapping and Traceability

- Map your entire supply chain from raw materials to finished products
- Identify all suppliers, including those at lower tiers
- Implement traceability systems to track material and component origins

4.2 Conduct Due Diligence

- Develop and distribute supplier questionnaires
- Plan and execute on-site supplier audits
- Perform background checks on suppliers against the Entity List

4.3 Documentation and Record-Keeping

- Establish a system for meticulous record-keeping
- Maintain detailed records of supply chain mapping efforts
- Document all due diligence activities and compliance measures

4.4 Develop a Code of Conduct

- Create a robust code prohibiting forced labor
- Clearly communicate expectations to all suppliers
- Ensure the code is easily accessible and understood

4.5 Engage with Suppliers

- Communicate your commitment to UFLPA compliance
- Provide support and resources for suppliers to improve practices
- Establish regular communication channels for updates and concerns

4.6 Create a Remediation Plan

- Develop a clear plan for addressing identified instances of forced labor
- Outline steps for immediate action and long-term resolution
- Include provisions for supplier termination if necessary



Take Action Today

UFLPA compliance doesn't have to be overwhelming. With the right expertise, you can streamline your approach, minimize risks, and stay ahead of regulatory changes.

Get expert guidance from Sedex's sustainability specialists. We'll help you implement this checklist, refine your due diligence strategy, and prepare your organization for compliance.

Boost your UFLPA readiness.

Contact Sedex for tailored support.

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