

STRT Slavery & Trafficking Risk Template

Description: The Slavery & Trafficking Risk Template (STRT) is a standard survey for the collection and sharing of slavery, human trafficking and child labour risk and compliance-related data across supply chains. In all likelihood, you are completing the STRT at the request of one or more of your customers, and will need to submit the STRT along with supporting documentation once completed.

Choose your language:

English

Version:

3.2

Instructions:

All yellow fields require a response unless otherwise noted. Gray fields do not require a response.

'Supporting Documentation Required' column = identifies the supporting documentation required to support your answer.

'URL or File' column = please choose whether you will provide a link or file to the required supporting documentation (where applicable).

'Insert URL to relevant document(s) or insert relevant file name(s)' column = please insert the direct URL to, or the file name(s) of, the documents supporting your answers wherever supporting documentation is required. For files, please share the corresponding document(s) separately or insert them as objects.

'Comments' column = please insert any comments, if desired. This field is optional.

'Goods of potential concern' field = identifies the goods covered by this declaration. This selection applies to the goods-specific questions in the STRT. The goods listed are goods that are known to be produced by child labor or forced labor in violation of international standards according to the US Department of Labor's Bureau of International Labor Affairs (ILAB). The 'goods of potential' is normally defined for you by your customer. Your customer may have asked you to declare good(s) that are not contained within your organization's product(s). In later questions in the STRT, you will have the opportunity to declare whether your organization's product(s) contain the good(s) under consideration. The 'goods of potential concern' can cover between zero and five goods. Service providers and other users can select N/A for this section of the Declaration if none of the goods apply to them and their customer has not provided alternative instructions.

'Topics scope' field = identifies the topics covered by this declaration. This selection applies to the topics-specific questions in the STRT. The 'topics scope' is normally defined for you by your customer.

'Regulatory scope' field = identifies whether all applicable regulations are covered by this declaration. This selection impacts questions 9 and 10 in the STRT. The 'regulatory scope' is normally defined for you by your customer.

Organization Information

Organization name (no abbreviations):	SGA Technologies Ltd.
Organization unique identifier number or code (optional):	
Organization address (optional):	
Contact person full name:	Andreea Manolache
Contact email:	andream@sgatech.co.uk
Contact phone number (country code + number):	01799 527264
Authorizing person full name:	Debbie de Zilva
Authorizer title:	Human Resources Manager
Authorizer email:	Debbied@sgatech.co.uk
Authorizer phone number (country code + number):	01799 527264
Date of completion (YYYY/MM/DD):	2023/08/08
Goods of potential concern 1:	N/A
Goods of potential concern 2:	N/A
Goods of potential concern 3:	N/A
Goods of potential concern 4:	N/A
Goods of potential concern 5:	N/A
Topics scope:	slavery, human trafficking and child labour
Regulatory scope:	All

Question #	Sub-Question #	Question	Question Response	Supporting Documentation Required	URL or File	Insert URL to relevant document(s) or Insert relevant file name(s)	Comments
Questions 1-10: Screening & Prioritization							
1		Where does your organization have operations? Please select all countries/jurisdictions that apply on the 'Countries' tab.	Number selected: 1				
2		Does your organization have operations in any of the sectors listed on the 'Sectors' tab? If Yes, please select all sectors that apply on the 'Sectors' tab.	Yes				
3		Does your organization produce and/or source (directly or indirectly) the good(s) covered by this Declaration in any of the source countries listed in the 'Source Countries' tab? Please select all countries that apply on the 'Source Countries' tab.					
4		Does your organization have a direct relationship with the supplier(s) growing, mining or manufacturing the good(s) covered by this Declaration?					

5		How many workers and agents does your organization employ?	1-100				
6		What is the age of your youngest worker or agent?	older than 18				
7		Does your organization employ or hire low-skilled foreign or domestic migrant workers (directly or through recruiters)?	No				
8		Does your organization use recruiters who hire subcontractors to recruit workers?	No, our recruiters do not hire subcontractors to recruit workers				
9		Do any of the goods, wares, articles, or merchandise that your organization produces, manufactures or mines originate, wholly or in part, in the Xinjiang Uyghur Autonomous Region of China, or by persons working with the Xinjiang Uyghur Autonomous Region government for purposes of the "poverty alleviation" program or the "pairing-assistance" program which subsidizes the establishment of manufacturing facilities in the Xinjiang Uyghur Autonomous Region?	No				
10		Do any of your suppliers produce, manufacture or mine goods, wares, articles, or merchandise that originate, wholly or in part, in the Xinjiang Uyghur Autonomous Region of China, or by persons working with the Xinjiang Uyghur Autonomous Region government for purposes of the "poverty alleviation" program or the "pairing-assistance" program which subsidizes the establishment of manufacturing facilities in the Xinjiang Uyghur Autonomous Region?	No				
Questions 11-13: Policy							
11		Does your organization issue a policy/policies explicitly prohibiting workers and agents from the following:					
	a	engaging in all forms of forced labor and human trafficking (also referred to as modern slavery)?	Yes	Policy required.	File	1). SGA Technologies Ltd Ethics Policy Signed 17.05.23 2). SGA Technologies Ltd	
	b	engaging in the worst forms of child labor? The worst forms of child labor includes hazardous child labor, which is work performed by a person under the age of 18 that jeopardizes their physical, mental or moral well-being. It includes work that takes place under particularly difficult conditions such as work for long hours or during the night.	Yes	Policy required.	File	1). SGA Technologies Ltd Ethics Policy Signed 17.05.23 2). SGA Technologies Ltd Supplier Principles Revised 02.11.2022	
	c	engaging in child labor? Child labor constitutes work performed by a person under the age for completing compulsory schooling, and in general not less than 15 years.	Yes	Policy required.	File	1). SGA Technologies Ltd Ethics Policy Signed 17.05.23 2). SGA Technologies Ltd Supplier Principles	
	d	withholding worker identity or immigration documents?	No				
	e	using recruiters that do not comply with local labor laws of the country in which the recruiting takes place?	Yes	Policy required.	File	SGA Technologies Ltd Ethics Policy Signed 17.05.23	
	f	discrimination before hiring, on the job or upon leaving based on race and/or colour, sex, religion, political opinion, national extraction, age, HIV/AIDS status, disability, nationality, sexual orientation, workers with family responsibilities, and trade union membership or activities?	Yes	Policy required.	File	Staff Handbook Jan 2023	
	g	charging workers or potential workers recruitment fees, according to the definition provided in the Glossary? Please note: You must read the definition of recruitment fees to accurately answer this question.	No				
	h	procuring commercial sex acts during the length of the contract?	Yes, broadly and/or only when required by law or by contract	Policy required.	File	Staff Handbook Jan 2023	
12		Does your organization issue a policy/policies explicitly ensuring the following:					
	a	the provision or payment of return transportation for all foreign migrant workers at the end of their period of work if they were brought to the country for the purpose of working for your organization (directly or through recruiters) unless they fall under the exceptions outlined in the Glossary under 'Return Transportation'?	N/A - We do not hire foreign migrant workers				
	b	housing provided or arranged for your workers meets host-country housing and safety standards?	N/A - We do not provide or arrange housing				
	c	workers, including migrant workers, can cancel their work contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with local law or a collective agreement?	Yes	Policy required.	File	Staff Handbook Jan 2023	
	d	wages meet applicable host country legal requirements or, if there is no legal minimum wage, wages are aligned with the prevailing sector wage?	Yes	Policy required.	File	Staff Handbook Jan 2023	
	e	workers have the right to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly in conformance with local law?	Yes	Policy required.	File	Staff Handbook Jan 2023	
	f	workers, including those hired by recruiters, are given detailed and accurate work agreements or similar work papers (prior to relocation if relocation is required) in a language understood by the worker?	No				
	g	document checks (including proof of age documents) of all workers before they begin working to confirm they are allowed to work according to legal standards and applicable organization policies?	Yes	Policy required.	File	Staff Handbook Jan 2023	
13		Does your organization issue a policy/policies regulating the use of foreign or domestic migrant workers.	N/A - We do not hire foreign or domestic migrant workers				
Questions 14-16: Supply Chain Management							

14		Does your organization issue a policy/policies to its suppliers covering the provisions you selected in Questions 11, 12 and 13?	No				
15		If you answered 'Yes' to Question 14, does your organization have contractual terms and conditions that require its suppliers to affirmatively agree to its policy/policies (or equivalent)?	No				
16		If you answered 'Yes' to Question 14 and/or 15, does your organization's policy/policies (or the equivalent) and/or contractual terms and conditions include a flow-down clause?	No				
Questions 17-22: Risk Identification and Management							
17		Does your organization perform formal screening and evaluation of prospective recruiters to determine if they (i) operate in compliance with the law and applicable organization policies, and (ii) observe the "employers pay" principle of not charging any recruitment fees to workers, as defined in the Glossary?	No				
18		Does your organization identify and assess risks on the topic(s) covered by this Declaration on an ongoing basis and taking into account risks arising from particular operating contexts in:					
	a	Your operations?	No				
	b	Your supply chain for the good(s) covered by this Declaration?					
	c	Your labor supply chain?	No				
19		If you answered 'Yes' to Question 18, does your organization respond to the identified risk on an ongoing basis, using this to drive continual improvement?					
20		If you answered 'Yes' to Question 18, does your organization use an independent third party to conduct these due diligence activities?					
21		What percentage of relevant suppliers have provided a response to your due diligence survey, such as the Slavery and Trafficking Risk Template (SSTR)?	100 %				
22		Does your organization conduct a formal vulnerability assessment of its workers to slavery and human trafficking?	No				
Question 23: Training							
23		Do your workers who have direct responsibility for supply chain management and recruitment receive training on how to mitigate risk on the topic(s) covered by this Declaration?	No				
Questions 24-26: Reporting & Internal Accountability							
24		Does your organization have a process for workers and agents to report, without fear of retaliation, matters related to the topic(s) covered by this Declaration?	No				
25		Does your organization maintain internal accountability standards and procedures to respond to a failure by workers and agents to meet organization policies on the topic(s) covered by this Declaration?	Yes	Proof of standard required	File	Staff Handbook Jan 2023	
26		Does your organization have processes in place to provide for or participate in remedy when there is an adverse impact related to the topic(s) covered by this Declaration?	No				
Question 27: Certification							
27		Does your organization prioritize the use of ethical recruitment agencies certified by credible assurance schemes?	No				
Question 28: Public Disclosure							
28		Does your organization publicly disclose information on the topic(s) covered by this Declaration? Note: Public disclosures may be compiled to comply with legal or regulatory obligations.	No				
Certification							
Do you certify that all the answers provided in this document are true and accurate to the best of your knowledge and understanding?							Yes