

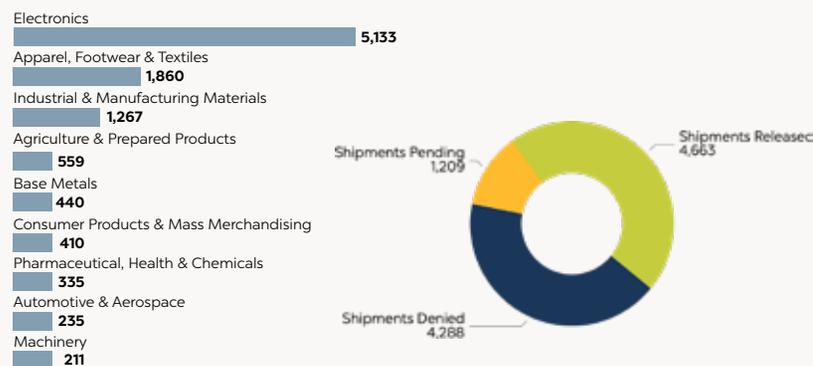
# Uyghur Forced Labor Prevention Act Checklist/FRDM Capabilities

The Uyghur Forced Labor Prevention Act (UFLPA) was enacted by the U.S. government to address the use of forced labor in supply chains, particularly focusing on goods sourced from China's Xinjiang region, where the Uyghur population faces human rights abuses. Under the UFLPA, the importation of goods suspected to be produced with forced labor is banned, unless proven otherwise by importers. U.S. Customs and Border Protection (CBP) had detained over \$3.5 billion worth of goods affecting over 8000 shipments primarily in sectors such as textiles, apparel, and solar panels, underscoring the strict enforcement of the act.

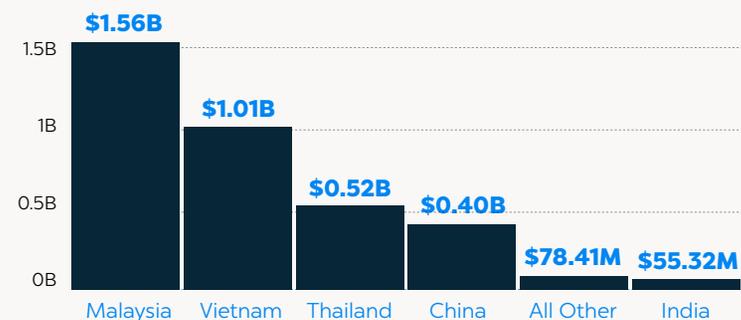
**FRDM (Freedom) is a Third Party Risk management (TPRM) software platform that helps companies ensure their supply chains are ethical, transparent, and free from human rights abuses.** FRDM provides detailed supply chain mapping that extends beyond tier-one suppliers. The platform helps companies trace their entire supply chain to identify suppliers operating in high-risk regions, particularly Xinjiang, China.

Under the UFLPA, U.S. Customs and Border Protection (CBP) assumes that any goods produced in whole or in part in Xinjiang are made with forced labor, meaning the burden of proof is on the importing company to demonstrate otherwise. Non-compliance can lead to the detention, seizure, and exclusion of goods, which has significant legal and financial implications for businesses. Any company that imports goods into the U.S. from China, particularly if their supply chains involve high-risk industries or regions like Xinjiang, must comply with the UFLPA.

**Shipment Count by Industry & Exam Result**



**Shipment Value by Country of Origin**



QUESTIONNAIRE QUESTIONS	FRDM PRIMARY	FRDM SUPPORTS	FRDM+ SERVICES	CUSTOMER	3 <sup>RD</sup> PARTY REQUIRED	EXPLANATION
<b>Due Diligence and Risk Assessment</b>						
Identification of risk of forced labor in your supply chain, particularly from high-risk regions like Xinjiang	✓					FRDM federates sub-suppliers into one view and monitors consistently for any changes
Assessment of supplier's capabilities including certifications, policies, and procedures	✓					FRDM's supplier assessment and certification tools autonomously score your supplier's fitness regarding human rights
Mitigation of risks including risk verification and supplier attestations	✓			✓		FRDM provides multiple risk mitigation tools to assist clients with their due diligence efforts
<b>Supply Chain Traceability</b>						
Trace raw materials originating with high prevalence of forced or child labor	✓					FRDM AI product genomics modeling creates bills of materials goods imported
Trace products with high prevalence of forced or child labor	✓					FRDM provides clear views of risk based on the salience and proximity of risk to your business by leveraging our product genomics modeling, supply chain mapping, and trusted risk analysis algorithms
Trace upstream sub-suppliers for connection to forced labor or high-risk regions	✓					FRDM searches billions of shipping records, ownership records, and trade data to find hidden risks in the supply chain
Monitor on-going commercial relationships in supply chain	✓					FRDM's data is updated daily to ensure accuracy
<b>Certification and Documentation</b>						
Federate relevant human rights certifications from direct and upstream suppliers	✓					FRDM federates each supplier's relevant human rights certifications and stores copies in your dashboard
Collect bills of sale from direct suppliers providing high risk products		✓		✓		Customers can work with suppliers via FRDM's Supplier Link technology to collect relevant documentation
Verify supplier codes of conduct	✓			✓		FRDM collects your supplier's codes of conduct to determine supply chain due diligence policies
Update your company's supplier code of conduct to ban goods made with forced or child labor sourced from banned and/or high risk regions				✓		FRDM+ Managed Services can assist with correct requirements and terminology
Perform social audit on suppliers in high-risk industries				✓	✓	FRDM can recommend vetted social auditors

QUESTIONNAIRE QUESTIONS

**Collaboration with U.S. Customs and Border Protection (CBP)**

Communicate with CBP to submit evidence and documentation within 30 days if goods are detained due to suspected forced labor involvement.

Provide proof that supply chain does not utilize forced labor

**Ongoing Supplier Monitoring**

Continuously monitor suppliers

Update compliance protocols to ensure long-term adherence to anti-forced labor practices.

**Supplier Contracts**

Include clauses in contracts with suppliers to prohibit the use of forced labor and ensure ongoing compliance with UFLPA requirements.

**Public Reporting and Disclosure**

Companies may need to publicly report their efforts to prevent forced labor in their supply chains, depending on the level of their exposure to high-risk regions or products.

	FRDM PRIMARY	FRDM SUPPORTS	FRDM+ SERVICES	CUSTOMER	3 <sup>RD</sup> PARTY REQUIRED
Communicate with CBP to submit evidence and documentation within 30 days if goods are detained due to suspected forced labor involvement.		✓	✓	✓	
Provide proof that supply chain does not utilize forced labor	✓		✓	✓	
Continuously monitor suppliers	✓				
Update compliance protocols to ensure long-term adherence to anti-forced labor practices.				✓	
Include clauses in contracts with suppliers to prohibit the use of forced labor and ensure ongoing compliance with UFLPA requirements.			✓	✓	
Companies may need to publicly report their efforts to prevent forced labor in their supply chains, depending on the level of their exposure to high-risk regions or products.			✓	✓	

EXPLANATION

FRDM can assist with generating supplier reports based on CBP requirements

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FRDM's database is updated daily

FRDM+ Services can assist with supplier due diligence

FRDM will work with your company to draft appropriate clauses and best practices.

FRDM supports your companies reporting efforts with quarterly risk reports.

**Book a call today @ [FRDM.co](https://www.frdm.co) with an expert to bring your business into compliance**