

Special Edition

CHTCS JOURNAL

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Educating corporations and corporate counsels on the business risks associated with human trafficking, forced labor, and modern slavery within supply chains



Global Risk Assessment Technology (GRAT) is a revolutionary AI-driven total risk and compliance technology that provides organizations with a single platform to manage all their risk and compliance programs.

Counter Human Trafficking Compliance Solutions (CHTCS) is a global compliance and advisory company that provides on-site assessments, improvement plans, training, research, and supply chain transparency required for corporations to combat human trafficking, forced labor, and modern slavery.

The **U.S. Chamber of Commerce** is the world's largest business organization representing companies of all sizes across every sector of the economy and advocates for pro-business policies that help businesses create jobs and grow our economy.



U.S. Chamber of Commerce &





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How the Business Community Can Combat Human Trafficking

By the U.S. Department of Homeland Security's (DHS) Blue Campaign

Millions of men, women, and children are trafficked worldwide, including in the U.S. Trafficking occurs in urban, suburban, and rural communities, and it impacts people regardless of age, race, gender identity, sex, ethnicity, nationality, immigration status, and socioeconomic class. The private sector plays a critical role in combating human trafficking. Businesses can educate employees, customers, and communities on how to recognize and report this crime and ensure that their supply chains are free of forced labor.



✓ DHS Blue Campaign

Blue Campaign is a national public awareness campaign designed to educate the public, law enforcement, and other industry partners to recognize the indicators of human trafficking and how to appropriately respond to possible cases. It leverages partnerships with the private sector, non-governmental organizations, law enforcement, and state/local authorities to maximize national public engagement on anti-human trafficking efforts. Blue Campaign's educational awareness objectives consist of two foundational elements: prevention of human trafficking and protection of exploited persons.

✓ Stakeholder and Community Engagement

Campaign stakeholders often provide expertise in the development of new Campaign resources and valuable support by distributing these resources among their networks. Many of these products are publicly available and can be downloaded directly from Blue Campaign's website (<https://www.dhs.gov/blue-campaign>). Businesses can use Blue Campaign's awareness and training videos to educate employees on how to recognize and report the crime. In addition, the Campaign offers resources in different languages, such as its Human Trafficking 101 information sheet, available in 11 languages, and its key tag card, available in 17 languages.

Beyond employee education, private sector stakeholders work with Blue Campaign to generate public awareness within their communities and to their customers. Providing resources to customers entering businesses can prepare community members to be more vigilant about suspected human trafficking and when to report it. Campaign stakeholders maximize reach by supporting #WearBlueDay, the Campaign's largest Human Trafficking Prevention Month initiative of the year. On January 11, Blue Campaign stakeholders are asked to take a photo of themselves, friends, family, or colleagues wearing blue and share it on Twitter, Facebook, and/or Instagram. In January 2020, Blue Campaign's Wear Blue Day hashtag garnered over 40 million impressions. The reach of this message could not have been possible without the support of Campaign stakeholders.

✓ Soaring to New Heights

Human traffickers rely on public and private aircraft to operate as they transport their victims both domestically and internationally. The Blue Lightning Initiative (BLI) is an element of the Blue Campaign, led by the U.S. Department of Transportation and U.S. Customs and Border Protection (CBP), to combat human trafficking in the aviation industry. BLI trains aviation personnel, including both in-flight and ground staff, to identify potential traffickers and human trafficking victims and how to report the crime to federal law enforcement. More than 100,000 personnel in the aviation industry have been trained through BLI, and partners work to report suspicious activity to the Homeland Security Investigations' (HSI) Tip Line.

In November 2018, Blue Campaign hosted the first-ever BLI Stakeholder Summit in Washington, D.C., to further its efforts to combat human trafficking. The Summit attracted stakeholders from across the country, including air carriers, port authorities, industry associations, and law enforcement agencies. It included a panel of subject-matter experts from the Federal Aviation Administration, CBP, Association of Flight Attendants, Delta Air Lines, JetBlue Airways, and the Alaska Airport Police. Panelists shared industry best practices and protocols.

Since the Summit, BLI has more than doubled its partnership base and expanded its efforts to address human trafficking in the general aviation industry to include airports, private jet companies, and aviation businesses. Anyone interested in participating can visit the BLI website for more information.

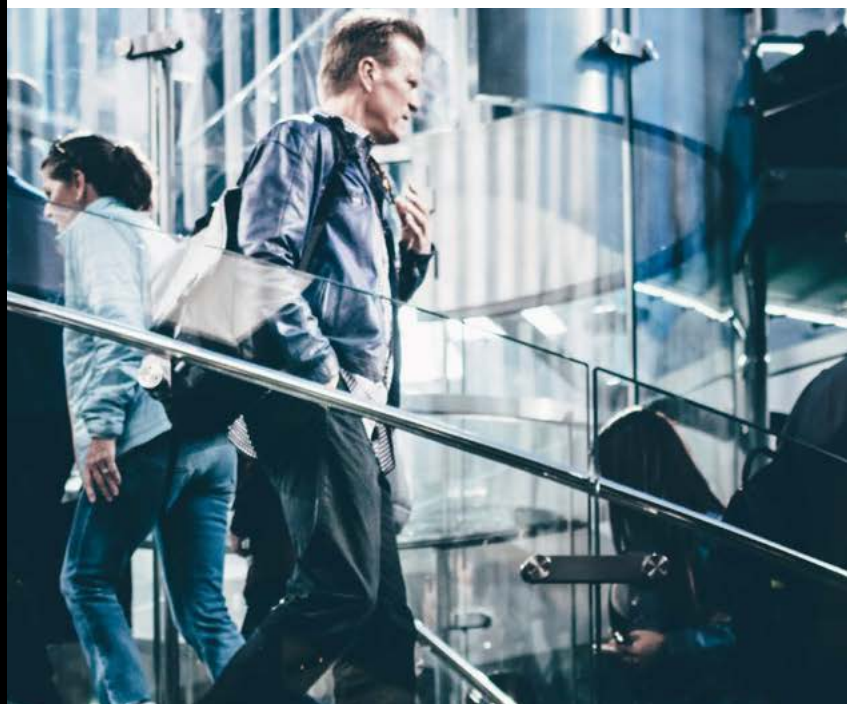


✓ Human Trafficking Notifications

Do not confront or engage a suspected trafficker.

Please follow these reporting options for situations involving potential human trafficking:

- Call 911 or local authorities if someone is in immediate danger.
- Follow your company's protocol for reporting suspicious activity or a crime taking place at your location.
- Call the DHS Tip Line at 866-347-2423 to report suspicious criminal activity, including human trafficking and criminal violations of forced labor in corporate supply chains, to federal law enforcement.
- To report suspected civil forced labor trade violations, submit information to CBP at its allegations portal.
- **If you are a victim, call the National Human Trafficking Hotline at 888-373-7888.**



✓ Actions Businesses Can Take

If you are a business owner, manager, or employee and want to get involved in anti-human trafficking initiatives, here are some steps you can take:

- If you work in the transportation or hospitality industries, download Blue Campaign's toolkits and share them with your colleagues.
- Print and display free, downloadable public awareness posters to reach employees, customers, and community members with reporting information.
- Watch, download, and share Blue Campaign's human trafficking awareness videos. Run videos on screens in your businesses, incorporate them into employee training, and/or share them on social media.
- Engage with @DHSBlueCampaign on Facebook, Twitter, and Instagram.
- Share your human trafficking awareness initiatives in an e-newsletter and encourage others to sign up for Blue Campaign's monthly e-newsletter.

CASE STUDY: PATIENTPOINT

PatientPoint delivers critical care — on a personal level

Wes Staggs, Chief Operating Officer

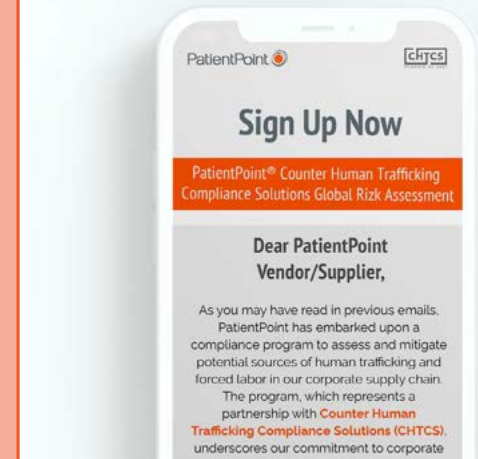
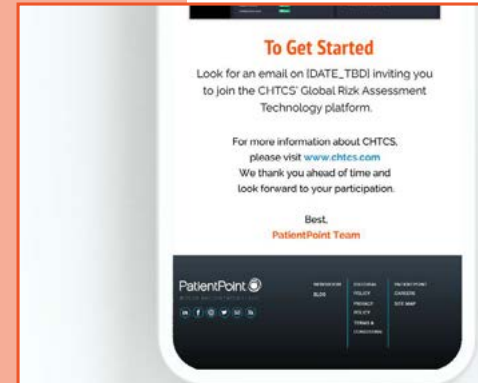
PatientPoint leads the way in delivering critical care for its providers and customers on a personal level by being the first of its kind in the digital health care industry to offer counter human trafficking supply chain tools and solutions. Specifically, it provided the technology for Counter Human Trafficking Compliance Solution’s analytical tool, the Global Risk Assessment Technology (GRAT), which provides cutting-edge analysis and tracking to mitigate slave labor in the supply chain. GRAT is an artificial intelligence-powered, data-driven tool that manages all aspects of supply chain risk.

PatientPoint’s compliance program powered by GRAT will assess and mitigate potential sources of human trafficking and forced labor in its corporate supply chain. All of PatientPoint’s vendors and suppliers will have access to a vast database of actionable intelligence that will allow PatientPoint to make significant supply chain decisions to help each business and contribute to the global fight against today’s human rights abuses. Additionally, the network gives resources needed to accurately survey and assess the conditions of current vendors and suppliers to ensure that the proper and relevant labor guidelines are followed across the board. Patient success and overall success in today’s times are very different. Having said that, PatientPoint knows that it is of the utmost importance to have social responsibility within the corporate supply chain.

1.

PatientPoint’s mission statement clearly focuses on providing integrated solutions surrounding key points of care in order to improve health care outcomes, efficiency, and patient satisfaction. How will a partnership with the U.S. Chamber of Commerce and Counter Human Trafficking Compliance Solutions help clients achieve social responsibility?

PatientPoint strives to ensure that powerful connections are made at the point of patient care. Providing innovative patient engagement resources and advanced patient technology to physicians and hospitals is of the utmost importance. Having said that, education and awareness are key. Most of us go through our day and execute our activities that are of the norm. Yet, in reality, there are many influencing factors that determine our points of care. PatientPoint cares about the vitality of the point of care. For example, when you look at human trafficking, it is not something that is obvious or understood, but it can exist everywhere, hidden in the shadows. As a company responsible for the care of patients, it is essential that there is visibility and responsibility within the point of care in our company. I believe that anything we can do to help improve our collective social responsibility makes all of us global citizens of care.





cognizant of the struggles of child labor and trafficking and identify the issues that exist within our global supply chains.

Even if one minute of mindfulness brings security to just one person, it is well worth the time.

3.

What led PatientPoint to consider Counter Human Trafficking Compliance Solutions for a counter human trafficking supply chain analysis tool that provides vendors with guidelines regarding social responsibility?

One of the things that PatientPoint is known for is making sure that the doctor-patient relationship is streamlined and transparent. Overall responsibility for the community and patient is a win-win for everyone. To make an impact on the hidden human trafficking dilemma, we must start with the initial steps, and that's within the supply chain. It's my passion to help this cause and the company as a whole. We must begin with the supply chain.

PatientPoint knows how to put the pulse on the livelihood of the patient, by 'making every doctor-patient engagement better.'® Uniqueness is rare today, especially in the field of health care. Having said that, PatientPoint makes the point to provide excellent care not only for the patient but for every provider — one supplier at a time.

2.

PatientPoint leads by example by providing toolkits and resources to help eliminate forced labor in businesses. How is your company leading the way in eliminating slave labor and human trafficking? What is the end game for PatientPoint as it pertains to human trafficking?

First and foremost, patient education is key. It has to be easy and nonburdensome for the patient in order to thrive in today's evolving landscape of health care. If it's too onerous for the vendor and patient, then it's not worth the time. Having said that, in this day and age, it is all too easy for us to busy and not to see the trouble that exists. If people actually knew the gravity and depravity of human trafficking, it would be mind-numbing. We need to be

TASK TO ERADICATE HUMAN TRAFFICKING FORCE

The mission of the task force, composed of Chamber member companies, is to educate stakeholders, lawmakers, senior government officials, and the public about best practices in supply chain management and identify strategies to combat human trafficking.

The group convenes meetings where stakeholders discuss their initiatives and partnerships with non-governmental organizations. Federal government officials from the departments of Labor and State have appeared as guest speakers at the U.S. Chamber to discuss the eradication of human trafficking.

Here are five ways that companies detect and eliminate human trafficking in their operations, in the operations of their business partners, and in their supply chains:

1. Involve C-suite leadership in identifying risky business partners and locations

When it comes to fighting trafficking, effective leadership comes from the top. Many companies issue public policy statements committing their leadership to respecting human rights. An increasing number of companies have board committees dedicated to corporate social responsibility, including addressing human trafficking in their supply chains. In addition, companies use in-house or third-party analysts to identify the areas where their business partners and operations may pose trafficking risks.

2. Measure and monitor the problem and solutions

Effective companies develop policies explicitly prohibiting human trafficking, including incorporating a zero-tolerance policy for human trafficking in supplier selection procedures. These policies apply to both company operations and their supply chains, including business partners like private employment agencies. These policies are integrated into contracts with suppliers and business partners.

Incorporating training programs to educate representatives on human trafficking has proved to be effective. Some firms conduct joint training and awareness-raising exercises and media campaigns with appropriate business partners and external stakeholders. Certain nonprofits and government agencies provide resources to assist with training. For instance, the U.S. Department of Homeland Security, as part of its Blue Campaign, offers a toolkit to educate employees in the hospitality industry.

Using in-house or third-party consultants to develop goals and key performance indicators is essential. Some companies require auditors to provide country-level reports on the political and socioeconomic situations of the countries in which they operate and how those situations affect workers in those nations. These efforts go a long way in keeping the task top of mind.

3. Work with suppliers and their employees to ensure compliance

Companies often require business partners to periodically certify that they comply with the companies' requirements on eradicating human trafficking from their operations. These certification requirements are integrated into the companies' contracts.

Some companies require business partners to provide access to a confidential helpline directly connecting the suppliers' employees with the firms. These helplines enable workers to express their complaints without fear of retaliation.

4. Examine production planning and recruitment practices

Companies that rely on business partners to manufacture and fulfill orders recognize that certain business conditions may create additional risks. Businesses seek to manage their demands to ensure that products are produced by known and trusted partners.

Recruiters function as a bridge between workers and employers and help match workers with positions. However, certain recruiters charge these employees fees that they cannot reasonably be expected to repay. This leads to debt bondage where workers are forced to give up most or all of their salary until these fees are repaid. To combat this situation, companies may institute policies barring recruiters from charging prohibitive or inappropriate recruitment fees or any related costs.

5. Take action in the community

Companies increasingly launch global, national, or local campaigns in cooperation with the media to promote their activities to eradicate human trafficking. They also work with international organizations, nonprofits, and trade associations to establish industrywide task forces on human trafficking dedicated to raising awareness.



Ask the Expert:

Michael Billet

Senior Manager of Policy Research

**Employment Policy Division
U.S. Chamber of Commerce**

One. Since the inception of the U.S. Chamber of Commerce's Task Force to Eradicate Human Trafficking, what is the mission of the task force, and what resources does the U.S. Chamber provide? What collective actions have members taken to ensure that U.S. supply chains are slave labor free?

The U.S. Chamber of Commerce established the Task Force to Eradicate Human Trafficking as an advisory group made up of members who work with the federal government and the private sector to develop holistic solutions and provide a united voice to eradicate human trafficking.

According to the U.S. State Department, human trafficking is a global problem affecting nearly 25 million people each year, who are illegally lured into forced labor and sexual exploitation through force, fraud, or coercion. The U.S. Department of Homeland Security estimates that human trafficking is second only to drug trafficking as the most

profitable form of transnational crime, generating billions of dollars a year in illicit profit. All victims of trafficking share one experience: the loss of freedom.

Industry has an important role to play. Businesses cannot do this work alone. The business community needs to partner with governments and non-governmental organizations to address the scope and depth of this problem. The task force develops toolkits, hosts forums, and engages in advocacy work to shine a spotlight on this problem.

According to the International Labor Organization, 19% of victims are trafficked for commercial sex and make up a vast majority of illicit profits. To conduct sex trafficking, traffickers rely on the transportation and hospitality sectors for moving and controlling victims, giving these sectors a critical role as the first line of defense.

Incidence of forced labor is widespread globally. If a product is made with forced labor, U.S. Customs and Border Protection (CBP) has the authority to withhold these goods by issuing a withhold release order (WRO). A WRO permits CBP to detain the products at U.S. ports of entry and compels importers to either export the products or prove that the product was produced without forced labor. At times, shipments already headed to the U.S. will be rerouted. When purchased goods are blocked from entering the U.S., those firms that are awaiting the merchandise may face financial repercussions.

The financial sector also plays a role in eliminating forced labor. Since 2018, financial institutions such as banks have been required by the U.S. Department of Treasury's Financial Crimes Enforcement Network (FinCEN) to identify and report suspicious activity related to human trafficking.

The U.S. Chamber has produced toolkits that outline best practices. The Chamber's and Truckers Against Trafficking's toolkit educates employees on the dangers posed by sex trafficking. The *Stop Trafficking Now* toolkit, created by the U.S. Chamber and A21, establishes procedures for businesses on how to detect and stop labor trafficking in supply chains.

As a best practice, the U.S. Chamber of Commerce and A21 *Stop Trafficking Now* toolkit recommends the use of audits to ensure that U.S. supply chains are slave labor free. Employees and suppliers should receive training on business protocol, how to lodge a complaint, and the need for periodic reviews. Businesses should also employ certification procedures in third-party contracts to ensure that such businesses conduct ongoing due diligence.

Chamber members rely on reports produced by the federal government, such as the U.S. State Department's Trafficking in Persons Report, to survey suppliers and facility locations. Companies use this report to understand country-specific risks.

Two. The United Kingdom, Australia, New Zealand, and the Netherlands have imposed reporting requirements on businesses to combat human trafficking and forced labor. Other countries seem to be following suit. In the U.S., is there a concern in the business community that there will be federal legislation that will impose such a mandate? What is the U.S. Chamber's position?

In the 116th Congress, two disclosure bills are H.R. 6279, the Business Supply Chain Transparency on Trafficking and Slavery Act sponsored by Rep. Carolyn Maloney (D-NY), and S. 4241, the Slave-Free Business Certification Act introduced by Sen. Josh Hawley (R-MO).

The Business Supply Chain Transparency on Trafficking and Slavery Act would amend the Securities Exchange Act of 1934 to require the Securities and Exchange Commission (SEC) to issue regulations imposing disclosure requirements on issuers that must report to the SEC and have annual global receipts exceeding US\$100 million. This measure is modeled after the California Transparency in Supply Chains Act, which applies to retail sellers and manufacturers that do business in the state of California and whose annual gross revenue exceeds US\$100 million.

Covered companies would be required to disclose whether they have taken measures to identify and address forced labor, slavery, human trafficking, and the worst forms of child labor in their supply chains and, if so, what measures they have taken. Among other things, the bill would require a consultation process to include solicitation of feedback from independent labor organizations, workers' associations, or workers. Companies would be required to include these disclosures in their annual reports to the SEC and post this information on their websites.

In contrast, the Slave-Free Business Certification Act would require companies with annual worldwide gross receipts of US\$500 or more to investigate and report on forced labor in their supply chains. The bill would broadly define forced labor as "any labor practice or human trafficking activity in violation of national and international standards." Also, it would require CEOs to certify that their companies' supply chains do not rely on forced labor. The U.S. labor secretary would have the ability to assess civil damages up to US\$100 million and punitive damages up to US\$500 million for failure to comply with the audit and reporting requirements.

The U.S. Chamber opposes these disclosure and reporting requirements as burdensome, since a one-size-fits-all approach will hamper innovation. Strategies to combat forced labor are highlighted in the U.S. Chamber's *Leading by Example* publication. Walmart, for instance, formed the Seafood Task Force to tackle the problem of Illegal, Unreported and Unregulated fishing in the farmed shrimp supply chain in Thailand.

Through the Seafood Task Force, Walmart is joining forces with retailers, suppliers, and non-governmental organizations to tackle Illegal, Unreported and Unregulated fishing (IUU) in the farmed shrimp supply chain in Thailand. This work is critical to addressing potential labor abuses and unsustainable fishing practices in the industry. The task force is developing a range of tools, including a Supply Chain Code of Conduct, an audit process and mechanisms for vessel tracking—all aimed at driving increased transparency in supply chains.

On its face, this type of reporting requirement seems innocuous. Upon further examination, these disclosure bills are of concern. Such legislation extends vicarious liability to a parent firm for the actions taken by its suppliers, sub-suppliers, and so forth. By mandating that companies delve deep into their supply chains, a business may be held responsible for actions taken in which they lack capacity to exercise direct control.

Furthermore, if either of these bills were to be enacted into law, non-governmental organizations may target companies using the publicly disclosed data. The consultation process in the Business Supply Chain Transparency on Trafficking and Slavery Act may be used by unions or worker representatives to damage a business's reputation when the firm is in the process of remediation. Similarly, imposition of civil monetary penalties may have the unintended consequence of companies pulling out of developing countries where workers rely on income provided by their jobs.

Three. How are companies leading the way in eliminating slave labor and human trafficking?

Companies are leading the way in eliminating slave labor and human trafficking through emerging technologies, which provide traceability, authenticity, and verification, to help map supply chains. The convergence of artificial intelligence and machine learning is assisting non-governmental organizations, businesses, and governments make better

informed decisions to prevent human trafficking. Companies that are leading efforts to map supply chains include IBM, Verité, and Counter Human Trafficking Compliance Solutions (CHTCS). For example, IBM's Traffik Analysis Hub is a partnership across sectors, including financial institutions, non-governmental organizations, law enforcement, and government agencies, that analyzes and processes data in real time for labor and commercial sex trafficking incidences. Additionally, Verité's software platforms, the Responsible Sourcing Tool and CUMULUS, enable companies to examine forced labor in supply chains.

CHTCS' Global Risk Assessment Technology (GRAT) is an AI-powered, data-driven tool used to manage all aspects of supply chain risk related to slave labor and provide corrective measures directly to suppliers. Secure cloud-based storage can be used for protection of data. Its user-friendly interface and interactive mapping enable it to be used with all platforms, including the black swan, environmental, social, and governance standards, and custom Intel technology, all on a single dashboard.

Businesses are also joining industry coalitions, such as the Responsible Business Alliance (formerly, the Electronics Industry Coalition). The Alliance identifies potential forced labor risks in the global electronics supply chain and develops tools for responsible recruitment.

Four. In the international community, there has been increased attention being paid to China's use of forced labor, specifically in the Xinjiang province. Business organizations may be complicit in the use of forced labor if they are doing business in that region. The U.S. House of Representatives has passed legislation to force publicly traded companies in the U.S. to disclose whether any of their goods, or any part of their supply chains, can be traced to forced labor in Xinjiang province, and it imposes a presumption by the U.S. federal government that any goods produced in the region are made with forced labor, thus blocking or diverting the import. What is the Chamber's activity in this area?

These measures follow enactment of the Uyghurs Human Rights Policy Act of 2020. Among other things, that law requires the U.S. State Department to report on the scope of the Chinese government crackdown of Uyghurs in Xinjiang.

On September 22, 2020, the U.S. Chamber sent a letter to the U.S. House that strongly condemns human rights abuses, including the persecution and detention of the Uyghur ethnic minority in China. The Chamber urged Congress and the administration to deploy targeted foreign policy tools and work with the business community to combat these abuses. However, the Chamber voiced its concern about specific provisions in the Uyghur Forced Labor Prevention Act and the Uyghur Forced Labor Disclosure Act that may render them ineffective and even hinder efforts to prevent ongoing human rights abuses. Past attempts to utilize domestic U.S. securities law to combat human rights abuses provide a cautionary tale. For example, a well-intentioned effort to resolve abuses related to the mining of conflict minerals in the Democratic Republic of the Congo (DRC) in many cases worsened the situation on the ground in that country.

In that instance, Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act required public companies to disclose if any of their products used a defined list of minerals, if the minerals were mined in the DRC, and if the products were conflict mineral-free. The absence of qualified inspection and audit systems made it nearly impossible for companies to ensure accurate disclosures. This, in turn, caused many companies to implement a de facto embargo against material sourced in the region, which then hurt legitimate miners.

At the same time, the original targets of the provision simply shifted their activities to avoid being impacted. In addition to the measure's unintended consequences, aspects of the conflict minerals disclosure were ultimately struck down by the courts. Policymakers should learn from the failures around the Dodd-Frank 1502 disclosure requirement and avoid using securities disclosure to root out human rights abuses.

The Chamber is continuing to engage with stakeholders on pending legislation. Our aim is to ensure the protection of human rights and address unacceptable forced labor practices affecting Uyghurs through workable, appropriate actions and initiatives.



U.S. Chamber Leads the Way on Eliminating Forced Labor

Businesses face an economic, legal, and reputational risk if they engage in human trafficking. As such, they have an important role to play, and they cannot do this work alone. The business community needs to partner with governments and non-governmental organizations, social service providers, skills-based training organizations, and others to address the scope of this problem.

On July 30, 2020, the U.S. Chamber hosted Eliminating Forced Labor, a webinar to discuss business engagement strategies on how to manage supply chain risks. Michael Billet, senior manager of policy research in the Employment Policy Division at the U.S. Chamber, kicked off the event to commemorate World Day Against Trafficking in Persons.

Glenn Spencer, senior vice president of the Employment Policy Division at the U.S. Chamber, stressed that businesses play a crucial role in detecting and remedying forced labor in supply chains. He said legislation that imposes reporting requirements for supply chain due diligence, such as the U.K. Modern Slavery Act, is concerning. This is because a one-size-fits-all approach may hinder voluntary efforts by the private sector to take the lead against human trafficking.

Stefan J. Marculewicz, shareholder and co-chair of the Business and Human Rights Practice Group at Littler Mendelson P.C., introduced Robert A. Destro, assistant secretary for the Bureau of Democracy, Human Rights, and Labor and U.S. special coordinator for Tibetan Issues at the U.S. Department of State.

Destro spoke about the Xinjiang Supply Chain Business Advisory issued by the U.S. departments of State, Treasury, Commerce, and Homeland Security (DHS). He said that employers may face penalties for failing to conduct due diligence of their supply chains in Xinjiang province, China.

Gabriella Rigg Herzog, vice president of corporate responsibility and labor affairs at the United States Council for International Business, led a discussion with federal government agency officials from DHS, the Office of the United States Trade Representative (USTR), and the U.S. Department of Labor on implementing the U.S.-Mexico-Canada Agreement (USCMA) Forced Labor Enforcement Task Force required by Section 741.



James W. McCament, deputy undersecretary of the Office of Strategy, Policy, and Plans at DHS, stated that there is tension in active investigations between upholding a commitment to transparency and withholding information from impacted parties. He noted that having legal standards applied consistently is paramount for the business community. DHS is exercising its discretion in combating forced labor through, among other things, the use of Withhold Release Orders.

Josh Kagan, deputy assistant U.S. trade representative for labor at the Office of the USTR, said that if businesses raise concerns in countries where the U.S. has free trade or trade preference agreements, the USTR will engage with other countries' trade ministries to address the problem of forced labor systematically.

Marcia Eugenio, director of the Office of Child Labor, Forced Labor, and Human Trafficking at the U.S. Department of Labor's Bureau of International Labor Affairs, said, "The Bureau of International Labor Affairs is a knowledge generator and not an enforcement agency. Other agencies rely on the information we provide to help them prevent goods made from child or forced labor from entering into the U.S. market."

Jim Isajewicz, analyst manager at Thomson Reuters Special Services (TRSS), delivered a keynote titled Commercially Available Solutions for Disrupting Forced Labor Value Chains, where he discussed how the private sector is leading the charge against human trafficking. TRSS uses intelligence mapping to identify owners of illicit massage businesses, locate domestic agricultural farm workers who are held in debt bondage, and detect suppliers in the Xinjiang province of China that engage in human rights abuses.

Isajewicz issued a call to action for private companies to take the following steps to end modern slavery:

- Know your customers.
- Know your suppliers and their suppliers too.
- Look past the obvious.
- Invest in tools and services to pull in disparate data to develop a comprehensive understanding of your entire supply chain.
- Don't settle for minimum compliance.

Last, Sinead Bovell, founder and CEO at the Weekly Advice for the Young Entrepreneur (WAYE), led a conversation with industry experts to understand how technology impacts business decisions. She interviewed Lt. Col. James Wiley, chief operating officer at Counter Human Trafficking Compliance Solutions (CHTCS).

CHTCS' Global Risk Assessment Technology is novel in that it uses self-reporting questionnaires, coupled with data analytics and artificial intelligence, to detect forced labor patterns. The patterns are then graphically displayed via a complete suite of information visually through a heat map that is updated in real time.

Through its proprietary technology, CHTCS can predict population displacements and migratory patterns of vulnerable workers. According to Lt. Colonel Wiley, CHTCS forecasted the coffee crisis in the Northern Highland mountains in Guatemala and Honduras, as well as the migratory routes of these farm workers to other regions of Central America and Mexico, where those farm owners were warned about the increased risks of forced labor.

The impact of the U.S. Chamber's Eliminating Forced Labor event and task force meetings throughout the year have provided a path forward for policymakers and organizations alike to recognize how to combat slave labor and human trafficking.

Businesses face an economic, legal, and reputational risk if they engage in human trafficking.



KNOW WHO YOU DO BUSINESS WITH

The CHTCS Journal is published by the CHTCS Intel Team, which is composed of tenured military and business analysts with intimate knowledge and direct experience dealing with human trafficking, forced labor and modern slavery.

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The Counter Human Trafficking Compliance Solutions Journal is a newsletter published by the CHTCS Intelligence Division. It is issued four times a year and provides updates for C-suite-level decision making in support of terrorism and human trafficking risk management of the supply chain. The CHTCS Journal serves to strengthen current corporate social responsibility policies.

We welcome feedback and suggestions for articles in future issues.

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