



# RESPONSIBLE SOURCING TOOL

## Mining Sector | Tool 6

### PROTECTIONS AGAINST TRAFFICKING IN PERSONS:

#### Supply Chain Mapping and Risk Assessment in the Mining Sector

Supply chain mapping is a foundational step in identifying and addressing risks related to human trafficking,<sup>1</sup> including forced labor, within complex global industries. The mining sector covers a range of materials, including metals, minerals, and stones, each following distinct supply chain routes. These supply chains are typically long and fragmented, involving multiple countries and specialized companies at different production stages. Mining itself includes ore extraction, quarrying, and on-site initial processes such as crushing, washing, and concentrating (beneficiation) to separate valuable metals from waste. After initial processing, materials are transported within the country or exported for further refinement, smelting, and processing before reaching manufacturers. Support work typical to most mining operations includes transport, drilling, mechanics, welding, carpentry, and general labor such as cooking and cleaning in mining camps.

This document provides a description of principles and a recommended process to follow for conducting due diligence and does not attempt to ensure compliance with any applicable legal requirements, such as Section 307 of the Tariff Act,<sup>2</sup> the Uyghur Forced Labor Prevention Act (UFLPA),<sup>3</sup> Section 1502 (Conflict Minerals) of the Dodd-Frank Act,<sup>4</sup> the EU Conflict Minerals Regulation,<sup>5</sup> the Buy American Act (BAA),<sup>6</sup> the Build America, Buy

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<sup>1</sup> **Note: The United States recognizes two primary forms of trafficking in persons: forced labor and sex trafficking. For the purposes of this and other tools in the set, several terms are used such as “trafficking in persons,” “human trafficking,” and “forced labor.” In relation to these tools, they refer to a crime whereby traffickers exploit and profit at the expense of adults or children by compelling them to perform labor.**

<sup>2</sup> [Tariff Act of 1930 \(19 U.S.C § 1307\).](#)

<sup>3</sup> [U.S. Customs and Border Protection. “Uyghur Forced Labor Prevention Act.”](#)

<sup>4</sup> [U.S. Securities and Exchange Commission. “Fact Sheet: Disclosing the Use of Conflict Minerals.” June 28, 2024.](#)

<sup>5</sup> [European Commission. “Conflict Minerals Regulation: The regulation explained.” 2021.](#)

<sup>6</sup> [Congress.gov. “H.R.3684 – Infrastructure Investment and Jobs Act.” 2021.](#)

[Made in America Office. \*What Is Build America, Buy America?\* 2022.](#)

America Act (BABA),<sup>7</sup> and the Federal Acquisition Regulation (FAR): Combating Trafficking in Persons,<sup>8</sup> nor legal requirements outside of the United States.

Artisanal and small-scale mining (ASM) adds additional layers of intermediaries and consolidators, which can obscure material origins and reduce transparency. Smelting is a critical point for traceability because inputs from different sources are frequently mixed.

These features—geographic dispersion, multiple tiers, and complex business relationships—make oversight and human rights due diligence difficult, increasing the potential for forced labor. Loss of visibility into working conditions and limited leverage over upstream actors further complicate monitoring and the implementation of labor standards.

Mapping these chains helps companies<sup>9</sup> gain the visibility needed to perform a high-level risk assessment. This risk information is then used to develop a mitigation strategy and ultimately implement ethical sourcing practices that meet legal and stakeholder expectations related to due diligence and accountability.

In their supply chain mapping efforts, companies should aim to develop both broad and deep visibility. This includes understanding the full span of their supply chains — reaching far upstream beyond direct suppliers— as well as building a body of knowledge about workforce demographics, use of recruitment agents, and other relevant practices at each tier. In short, effective mapping means identifying entities in the chain as well as building an understanding of where work is performed and under what conditions.

While mapping a company’s entire network of suppliers and other business partners is essential for due diligence, even more detail is required in some situations. Supply chain traceability, the process of recording, tracking, and verifying the complete journey of a product and its constituent components from their origin through every step of the supply chain to their final destination, builds on mapping and enables a company to

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<sup>7</sup> [Congress.gov. “The Buy American Act and Other Federal Procurement Domestic Content Restrictions.” 2022.](#)

<sup>8</sup> For guidance on complying with the Federal Acquisition Regulation (FAR): Combating Trafficking in Persons, please review Tool 12, RST’s Sample Compliance Plan Template.

<sup>9</sup> In the mining sector, the companies that would benefit from performing supply chain mapping and tracing materials and products to their origin are mineral traders, smelters, manufacturers and other buyers of metals and minerals, and buyers of products and structures manufactured with metals and minerals. Note: the term “company” is used throughout this document whenever referring to entities in the categories listed above.

trace the movement of specific batches of minerals and metals through the supply chain. This kind of information is critical to demonstrate compliance with, for example, Section 1502 (Conflict Minerals) of the Dodd-Frank Act for minerals from the Democratic Republic of Congo (DRC) and surrounding countries, with the Uyghur Forced Labor Prevention Act for materials originating from China, Section 307 of the Tariff Act, and the Federal Acquisition Regulation (FAR): Combating Trafficking in Persons.

Companies often have clear visibility into their direct suppliers (Tier 1), but this visibility typically drops off beyond the first tier. Tier 2 and Tier 3 suppliers may operate in settings with limited legal oversight or labor protections.

## Supply Chain Mapping and Risk Assessment as Part of Broader Due Diligence

There are several characteristics that can increase the risk of forced labor and other abusive labor practices in mining supply chains, including:

- Complex and often opaque multi-tier structures;
- The use of labor agents at various tiers;
- Presence of intermediaries, such as traders and distributors, which can complicate tracing metals and other materials to their source; and
- Sourcing from high-risk geographies, including regions with weak labor enforcement or histories of systemic labor abuse.

Developing an understanding of the structure, geographic distribution, and profiles of the business entities in a supply chain allows a company to assess the risks of forced labor and other human rights abuses in its sourcing of labor, products, materials, and services.

### **Why do it?**

To prioritize and focus efforts to address risks. Because a company's resources to prevent and mitigate salient issues like forced labor are limited, it needs a way to identify, segment, and prioritize the risks it will address first and develop a strategy to prevent harm. The mapping process should provide the inputs on which a risk analysis

is framed, including such data points as:

- Location. Risks inherent to the country of operation (e.g., lack of labor law protections, poverty, corruption, or documented history of poor regulatory enforcement).
- Product or service provided. Forced labor vulnerability related to the type of production.
- Use of labor recruiters and agents<sup>10</sup>. Risks associated with outsourced labor recruitment.
- Presence of migrant workers. Vulnerability to forced labor is highest among migrant workers.
- Use of recruitment agents. Employers lose control of recruitment risks when they outsource recruitment to agents.

Mapping a supply chain usually involves desk research and outreach to suppliers, starting with Tier 1 suppliers and working to identify their suppliers, those suppliers' suppliers, and so on. Based on the resulting map and initial risk analysis, companies can prioritize specific supply chain segments for targeted engagement, such as audits, worker interviews, or site visits.

Demonstrate accountability. Supply chain mapping and risk assessment also contribute to external accountability. Companies that can document the structure of their supply chains and disclose relevant findings are better positioned to demonstrate compliance with legal requirements and customer and stakeholder expectations. In cases involving high-risk geographies or suppliers, mapping and risk assessment enable companies to show the specific foundational steps they have taken to prevent and mitigate labor risks.

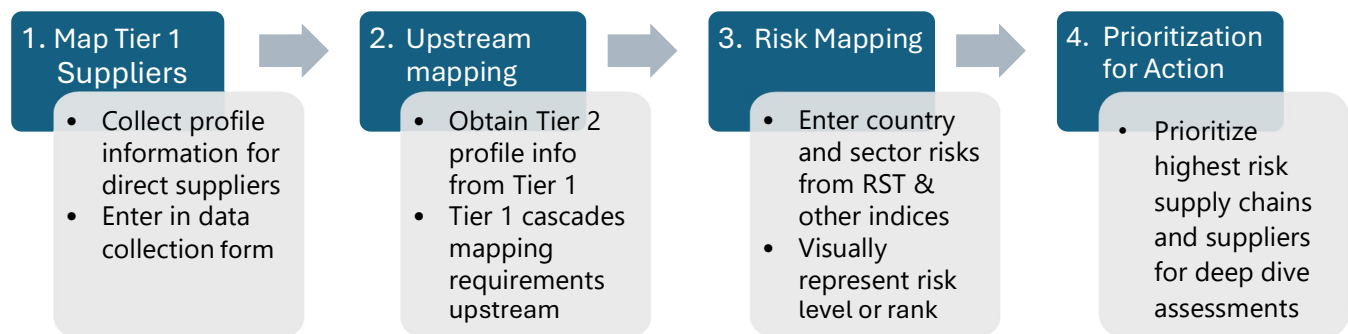
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<sup>10</sup> The combination of services provided by third parties to find, place, and/or directly contract labor to work in company owned or supplier operations are varied, as are the terms used by different industry sectors and standards organizations to describe the providers. These include labor agents, recruiters, recruitment agents, sub-agents, labor providers, private employment agencies (PEAs), staffing agents, manpower agents, brokers, contractors, crew leaders, and gangmasters. For the purposes of these tools, "labor agent" is generally used as the umbrella term, with "recruitment agent" used as a subset.

## Guide to Supply Chain Mapping and Risk Assessment

**Supply Chain Mapping.** Working with a company’s procurement organization to map its supply chain will result in a wide range of detailed data, including a listing of all known suppliers<sup>11</sup> and their locations, the identities of any subcontractors, distributors, or agents used by its suppliers, the products and services that each supplier provides, and any supplier purchase agreements or contracts and their renewal dates.

**Risk Assessment.** The gathered data is then used to perform a high-level, usually desk-based risk assessment to determine and prioritize next steps. These are in-depth assessments of specific suppliers or segments of the supply chain or, in some cases, taking action to address identified forced labor and other labor issues.



## How to Collect Information<sup>12,13</sup>

### Step 1: Map Tier 1 Suppliers

Most companies’ procurement organizations already maintain supplier records for their direct (Tier 1) suppliers. These are typically the easiest to map because they are in contractual relationships with the buyer. Different approaches to ensure the information is organized in a central location can vary from an excel spreadsheet to a sophisticated database.

<sup>11</sup> Refer to Appendix 1 in this document for a description of supply chain tiers and the common types of suppliers and other supply chain actors (e.g., recruitment agents).

<sup>12</sup> A data collection template to record supplier profile information at all supply chain tiers is provided in Appendix 2.

<sup>13</sup> For mapping conflict and high risk minerals, the Responsible Minerals Initiative provides guidance on tools for performing supply chain mapping at "[Minerals Due Diligence](#)," [Responsible Business Alliance](#).

Information can be gathered from suppliers through several means, which are usually best used in combination:

- self-assessment questionnaires/self-reporting (refer to Tool 8: Sample Mining Company and Supplier Self-Assessment Questionnaire); supporting documentation should be requested as part of completing a questionnaire;
- interviews with supplier staff who are in a position to provide data; these conversations are important for clarifying and validating information provided on a questionnaire;
- records of recent site visits and audits; and
- contracts, purchase orders, lists of raw materials, components and assemblies, and receipts.

See the Supply Chain Mapping and Risk Assessment Tool in **Appendix 2** for entering profile information for each supplier. This will also be used to perform a high-level assessment of potential forced labor risks (see Step 3 below).

## Step 2: Upstream Mapping

The process of mapping and assessing risk in a supply chain beyond Tier 1 suppliers includes surveying direct suppliers to gather information about their suppliers (Tier 2 and suppliers further upstream, and indirect service providers, such as janitorial staff). Tier 2 suppliers can then be queried about their suppliers, and so on, to the bottom of the supply chain. As was done for Tier 1, fill out the provided data collection form for each supplier in Tier 2 and below.

The process includes:

- Asking Tier 1 suppliers to identify their own suppliers (your Tier 2), including providing key facility information
- Setting clear expectations with Tier 1 suppliers that they will need to cascade the requirement for gathering of profile information on upstream tiers to their direct suppliers. This includes requesting Tier 1 suppliers to engage their own suppliers to:

- Notify the suppliers of the mapping initiative and why it matters;
- Request the same information as was provided to you by Tier 1;
- Identify challenges in obtaining that information; and
- Set and coordinate response timelines.
- Including mapping requirements in supplier contracts and procurement policies. (Traceability requirements should be covered here as well.)
- Offering guidance, templates, or digital tools for data collection that can be used by Tier 1 suppliers and others further upstream.
- Clarifying which types of suppliers are in scope.
- Tracking progress and updating regularly:
  - Maintaining a living database or visual map;
  - Updating the map as products or suppliers change; and
  - Monitoring Tier 1 participation and following up as needed.

## Enhancing Mapping Data with Supply Chain Traceability

A company's mapping data will visually document its entire supply chain network by identifying all supply chain actors and their relationships. However, this information may be insufficient to verify the origin and chain of custody for all raw materials, components, and other products in the supply chain. This requires traceability, which is the process of tracking the details of every transaction in the supply chain from end to end, with such data as:

- Purchase orders and invoices;
- Subcontracting agreements;
- Shipping documents and import/export records;

- Bills of materials (BOMs);
- Payment flows, such as bank transfer records;
- Sourcing declarations;
- Chain-of-custody documentation; and
- Traceability technology systems (e.g., blockchain, RFID tagging).<sup>14</sup>

These data sources can improve the accuracy of supply chain maps by confirming supplier relationships, identifying product flows, and clarifying transit routes. When used alongside supplier-reported data, this type of verification increases transparency, strengthens due diligence and reinforces labor rights protections across the mining supply chain, enabling the tracing of products and materials to their source.<sup>15</sup>

### Step 3: Risk Mapping

Once a company has gathered profile information on all the suppliers and other business partners in its supply chain, the next step is to identify the potential forced labor risks associated with each one. The “Risk Assessment Guidance” column in the Supply Chain Mapping and Risk Assessment Tool describes the types of risks that may be associated with each piece of supplier profile information entered in the form.

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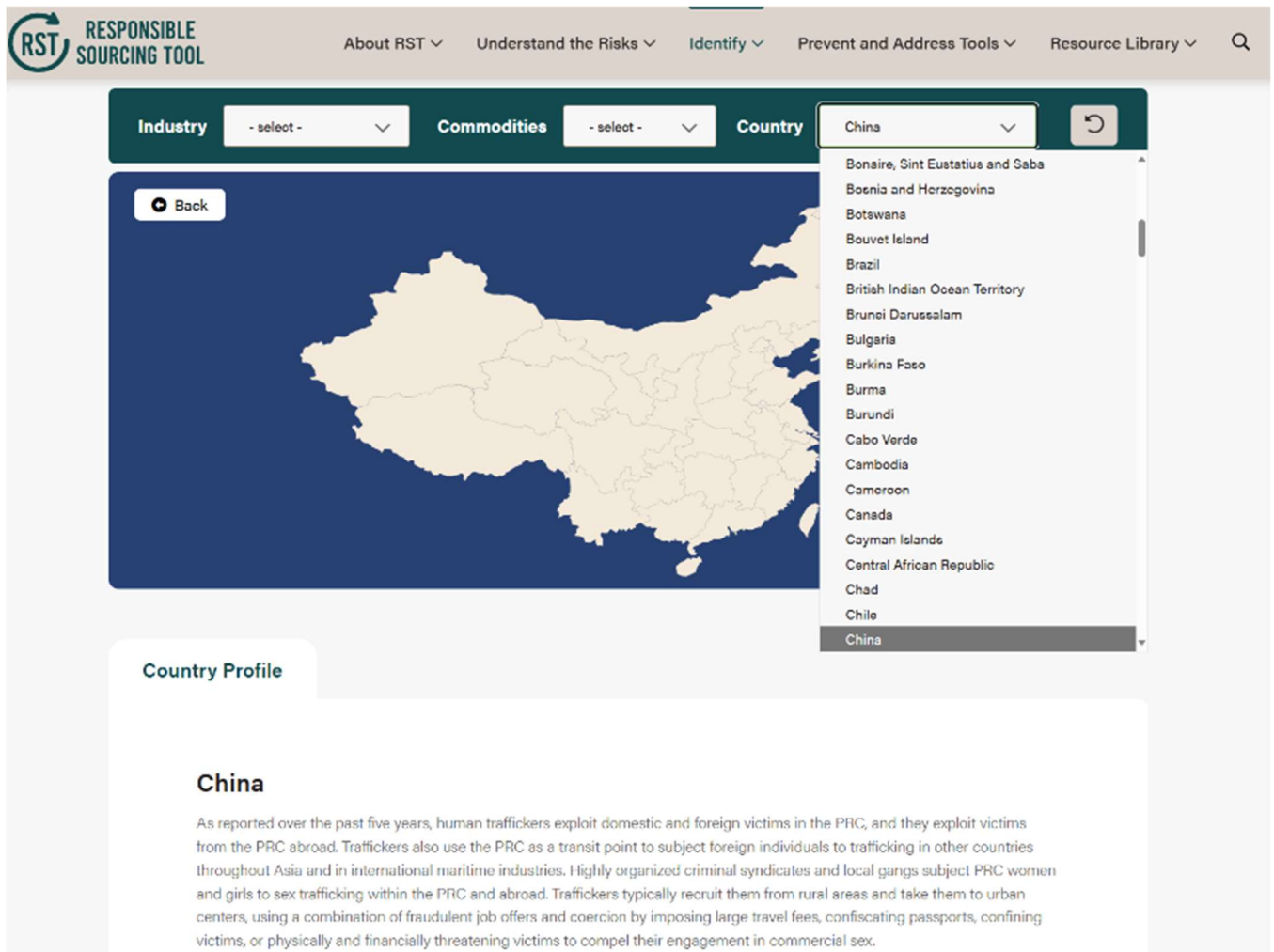
<sup>14</sup> [“STREAMS Traceability & Labor Due Diligence Resource Suite.” Verité.](#)

<sup>15</sup> Traceability is critical for verifying compliance with Section 1502 (Conflict Minerals) of the Dodd-Frank Act, the Uyghur Forced Labor Prevention Act (UFLPA), Section 307 of the Tariff Act, and the Federal Acquisition Regulation (FAR): Combating Trafficking in Persons.

## Country Risk

Country-specific data for each of the risk indicators listed on the form can be found on the [“Identify Risks” page](#) at ResponsibleSourcingTool.org. Do the following:

1. Select the country from the dropdown list



The screenshot shows the RST Responsible Sourcing Tool interface. At the top, there is a navigation bar with the RST logo and the text 'RESPONSIBLE SOURCING TOOL'. To the right of the logo are several menu items: 'About RST', 'Understand the Risks', 'Identify', 'Prevent and Address Tools', and 'Resource Library'. Below the navigation bar is a form with three dropdown menus: 'Industry' (set to '- select -'), 'Commodities' (set to '- select -'), and 'Country' (set to 'China'). A 'Back' button is located to the left of the 'Country' dropdown. The 'Country' dropdown menu is open, showing a list of countries including Bonaire, Sint Eustatius and Saba, Bosnia and Herzegovina, Botswana, Bouvet Island, Brazil, British Indian Ocean Territory, Brunei Darussalam, Bulgaria, Burkina Faso, Burma, Burundi, Cabo Verde, Cambodia, Cameroon, Canada, Cayman Islands, Central African Republic, Chad, Chile, and China. Below the form is a 'Country Profile' section for China, which contains a paragraph of text describing human trafficking in the PRC.

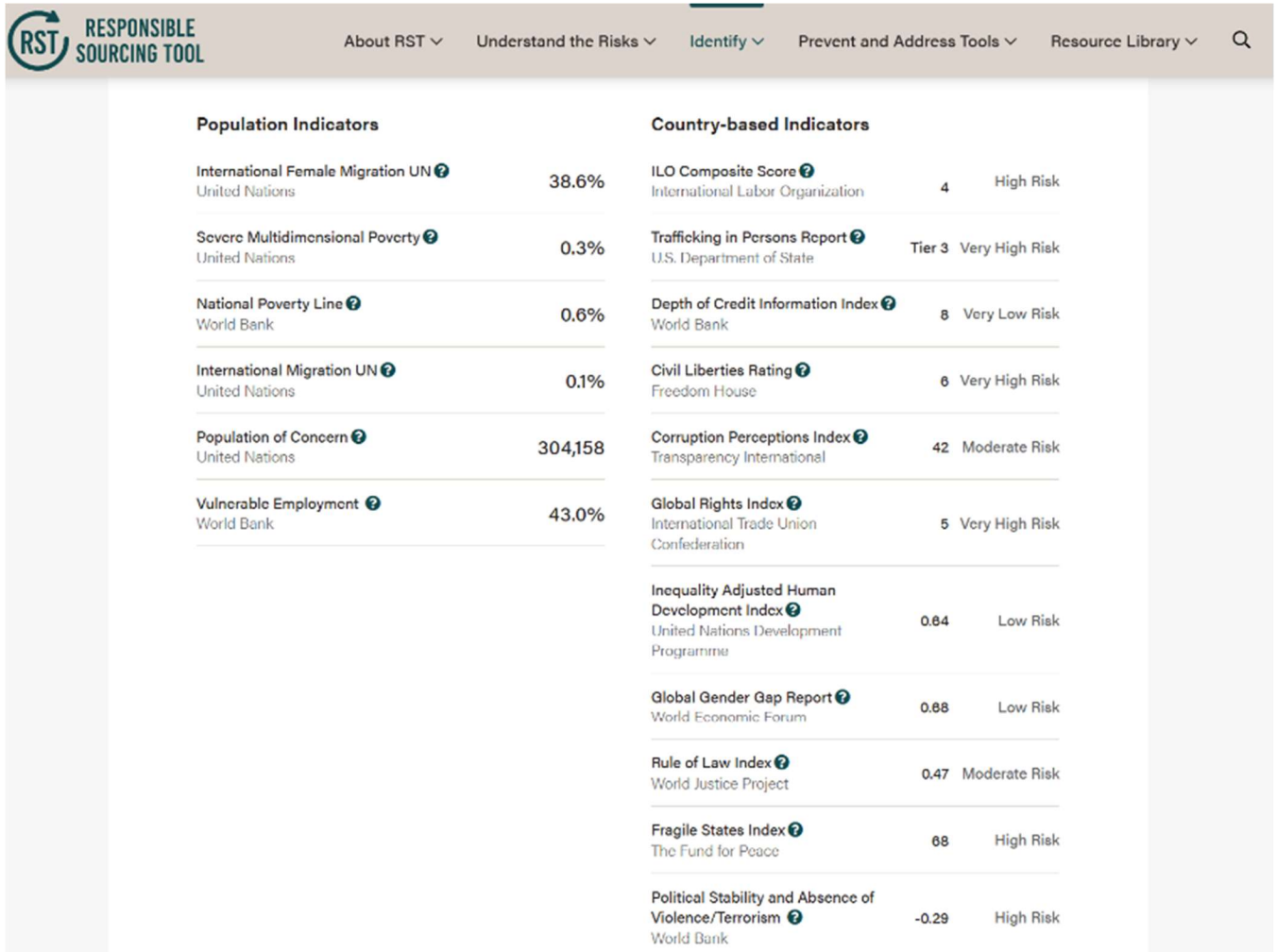
**Country Profile**

**China**

As reported over the past five years, human traffickers exploit domestic and foreign victims in the PRC, and they exploit victims from the PRC abroad. Traffickers also use the PRC as a transit point to subject foreign individuals to trafficking in other countries throughout Asia and in international maritime industries. Highly organized criminal syndicates and local gangs subject PRC women and girls to sex trafficking within the PRC and abroad. Traffickers typically recruit them from rural areas and take them to urban centers, using a combination of fraudulent job offers and coercion by imposing large travel fees, confiscating passports, confining victims, or physically and financially threatening victims to compel their engagement in commercial sex.

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2. Scroll down the page to view the risk rating for each of the indicators



Population Indicators		Country-based Indicators	
International Female Migration UN <sup>?</sup> United Nations	38.6%	ILO Composite Score <sup>?</sup> International Labor Organization	4 High Risk
Severe Multidimensional Poverty <sup>?</sup> United Nations	0.3%	Trafficking in Persons Report <sup>?</sup> U.S. Department of State	Tier 3 Very High Risk
National Poverty Line <sup>?</sup> World Bank	0.6%	Depth of Credit Information Index <sup>?</sup> World Bank	8 Very Low Risk
International Migration UN <sup>?</sup> United Nations	0.1%	Civil Liberties Rating <sup>?</sup> Freedom House	6 Very High Risk
Population of Concern <sup>?</sup> United Nations	304,158	Corruption Perceptions Index <sup>?</sup> Transparency International	42 Moderate Risk
Vulnerable Employment <sup>?</sup> World Bank	43.0%	Global Rights Index <sup>?</sup> International Trade Union Confederation	5 Very High Risk
		Inequality Adjusted Human Development Index <sup>?</sup> United Nations Development Programme	0.64 Low Risk
		Global Gender Gap Report <sup>?</sup> World Economic Forum	0.88 Low Risk
		Rule of Law Index <sup>?</sup> World Justice Project	0.47 Moderate Risk
		Fragile States Index <sup>?</sup> The Fund for Peace	68 High Risk
		Political Stability and Absence of Violence/Terrorism <sup>?</sup> World Bank	-0.29 High Risk

3. Enter the country’s risk level for each indicator on the **Supply Chain Mapping and Risk Assessment Tool**.

### Sector Risk

The Responsible Sourcing Tool also provides risk information for a number of industries, minerals, and metals. Follow the same process outlined above to get risk information relative to the supplier’s industry and, in some cases, for the typical minerals and metals associated with the type of industry.<sup>16</sup>

<sup>16</sup> Other sources of risk information on minerals and metals can be found in the “Material Tracking Schedule” and “Slavery and Trafficking Risk Template” tools in the [Design for Freedom Toolkit](#) by Grace Farms.

## Step 4: Prioritization for Action

### Deep Dive Risk Assessments

After filling in the profile information for each supplier and the corresponding risk factors, companies will have the information needed to identify and prioritize specific supply chains and suppliers for in-depth assessments based on the risk map / ranking created from the risk indicators listed on the Supply Chain Mapping and Risk Assessment Tool (refer to Appendix 2). These deeper assessments provide insight into the actual practices of individual suppliers as well as the labor recruiters and subcontractors they engage.

Supply chain mapping data can also reveal gaps in supply chain visibility—such as limited information on upstream producers—and highlight structural barriers to transparency, including weak traceability systems or purchasing practices that limit access to relevant labor information for supplier sites. Companies should use the identified gaps to strengthen their data gathering in support of developing more focused and feasible due diligence strategies.

For more information on conducting these assessments, see:

- Tool 7: Criteria for Screening and Evaluating Labor and Recruitment Agents
- Tool 8: Sample Mining Company and Supplier Self-Assessment Questionnaire
- Tool 9: Monitoring the Performance of Labor Agents in the Mining Sector
- Tool 10: Conducting Migrant Worker Interviews in the Mining Sector

## Appendix 1

### Overview of Supply Chain Tiers and Actors

Understanding the types of actors at each tier is essential for effective supply chain mapping and risk screening, particularly when assessing the potential for forced labor in mining sector supply chains. While different types of mining operations may have industry-specific suppliers and contractual relationships, there are consistent patterns across modes regarding how traders, refiners, smelters, suppliers, labor agents, and other intermediaries are structured within and across tiers.

**Tier 1: Direct Suppliers** are companies that provide metals, mineral products, or products and components containing metals and minerals, and essential services directly to the final manufacturer or buyer. These suppliers are usually under contract and subject to established quality and compliance oversight. Examples of actors at this tier may include:

- Traders, distributors, or wholesalers of metals, minerals, and stone products;
- Manufacturers of composite parts, components, or assemblies containing metals, minerals, and stone products;
- Firms providing specialized technical services (e.g., IT systems); and
  - Services providers (e.g., maintenance, security, janitorial, food services).

Tier 1 suppliers may have relatively sophisticated management systems in place but could themselves rely on subcontractors or upstream providers for which they have limited visibility.

**Tier 2: Intermediate Product Suppliers:** Tier 2 suppliers provide parts or services to Tier 1 suppliers. These entities may manufacture components, process or fabricate materials, or perform essential subcontracted functions. This tier is where supply chains often begin to branch out significantly, both geographically and organizationally. Actors at this level may include:

- Medium-sized manufacturers and processors producing metal bar, sheet and wire, and metal parts and components (e.g., bolts, beams, pipe);
- Metal and mineral processors (e.g., smelters, refiners, stone quarries); or
- Ore traders, distributors, or wholesalers.

Tier 2 suppliers may require capacity building to map their own suppliers and to meaningfully integrate that information into due diligence efforts or systems.

**Tier 3 and Upstream:** Tier 3 and upstream actors are furthest from the manufacturer or builder and therefore, downstream companies are likely to have the least visibility into them. These include mine quarries and companies performing initial processing or beneficiation of ores. Common actors in the most upstream tiers include:

- Mining companies (underground, open pit, alluvial, ASM)
- Mine site services providers
- Ore processors
- Ore and stone traders and transporters
- Informal or semi-formal labor providers

Like Tier 2 suppliers, suppliers at Tier 3 and below are likely to need capacity building and resources to enable them to effectively map their suppliers and build an understanding of their labor practices.

### **Labor Agents (across all tiers)**

In addition to material, manufacturing, and services suppliers, labor agents are involved in the recruitment, selection, hiring, and management of workers at all tiers of the supply chain. These may include:

- Entities that provide workers for companies to supplement their regular workforce to meet production requirements or as temporary replacements for workers on long term leave. The workers are employees of these agents, often referred to as staffing agents.
- Third-party labor recruiters. Employers outsource some or all of their recruitment and hiring to these entities who source workers for suppliers, often across borders.
- Sub-agents and informal agents, often referred to as brokers. These entities are engaged through third-party labor recruiters to recruit and screen job candidates, often in migrant-sending countries.

The presence of labor agents increases the risk of forced labor when recruitment practices are not monitored, when workers are charged illegal fees, or when employment contracts are unclear or misleading. Therefore, it is critical to understand at which points in the supply chain these labor agents are present. Over time, information can be collected on the labor supply chains and practices of third-party labor agents.

### **Information to Collect**

Companies should gather information at every supplier tier that can help them evaluate the human rights risk profile of those suppliers, including their capabilities to conduct human rights due diligence.

The table in Appendix 2 on the following page is provided as a data collection and risk evaluation tool for companies to use when mapping their supply chains.

## Appendix 2

### Supply Chain Mapping and Risk Assessment Tool

Profile Information		Risk Assessment Guidance
1. Supplier name		
2. Contact name:		
3. Headquarters address		
4. Address of supplier facility or worksite <i>(Note: complete one form per facility)</i>		<p>Identify and evaluate risks factors for the country of operation<sup>17</sup>:</p> <p><b>1. Legal/Policy Risk Factors</b></p> <ul style="list-style-type: none"> <li>a) Degree to which the country upholds labor rights. (<i>Global Rights Index – International Trade Union Confederation, ITUC</i>)</li> <li>b) Status of political and civil rights in the country. (<i>Civil Liberties Rating – Freedom House</i>)</li> <li>c) Has the country ratified 10 key ILO Conventions? (<i>ILO Composite Score – International Labour Organization</i>)</li> </ul> <p><b>2. Political Risk Factors:</b></p> <ul style="list-style-type: none"> <li>a) Level of political instability or conflict (<i>Political Stability and Absence of Violence/Terrorism – World Bank</i>)</li> <li>b) Level of crime and violence (<i>Fragile States Index – The Fund for Peace</i>)</li> </ul>

<sup>17</sup> The country-level risk ratings for each listed risk factor/indicator can be found in the “[Identify Risks](#)” section of the ResponsibleSourcingTool.org upon selecting the country of interest. A description of each indicator is shown by hovering the cursor over the question mark next to the indicator name.

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Profile Information		Risk Assessment Guidance
		<ul style="list-style-type: none"> <li>c) Level of state persecution (<i>Fragile States Index – The Fund for Peace</i>)</li> <li>d) Level of corruption (<i>Corruption Perceptions Index – Transparency International</i>)</li> </ul> <p><b>Socio-economic Risk Factors:</b></p> <ul style="list-style-type: none"> <li>a) Presence and concentration of migrant workers (<i>International Migration - Internation Organization for Migration</i>)</li> <li>b) Presence of migrant workers from vulnerable countries (<i>Population of Concern – United Nations</i>)</li> <li>c) Level of national economic development (<i>Inequality Adjusted Human Development Index – United Nations Development Program</i>)</li> <li>d) Level and extent of poverty (<i>Multidimensional Poverty Index – United Nations</i>)</li> <li>e) Degree of gender inequality (<i>Global Gender Gap Report – World Economic Forum</i>)</li> </ul> <p>For more information on understanding risks tied to these features see: <a href="#">Geography – Country » Responsible Sourcing Tool</a></p>
5. Type of product or service provided by the facility or worksite		<p>Evaluate overall forced labor vulnerability tied to type of production and structural features of supply chains. Factors to consider include:</p> <ul style="list-style-type: none"> <li>a) Long, complex, and/or non-transparent supply chains</li> <li>b) Seasonal surges in labor demand</li> <li>c) Short production cycles</li> <li>d) Undesirable and/or hazardous work</li> <li>e) Typical use of labor agents</li> </ul>

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Profile Information		Risk Assessment Guidance
		<p>For general information on understanding risk related to structural supply chain features, see: <a href="#">Sector – Product » Responsible Sourcing Tool</a></p> <p>For more information on the nature of labor rights risk and the vulnerability of workers to forced labor related to various goods, and how the characteristics of different product supply chains impact supply chain traceability, see: <a href="#">Supply Chain Typology - Verité</a></p>
6. Number of workers hired directly		Only include those workers hired and employed directly by the supplier without the use of recruitment or labor agents.
7. Number of workers hired through recruitment agents/labor agents		<p>Use of third-party labor recruiters or other subcontractors increases forced labor risk overall in any given operation. Worksites with a relatively high proportion of:</p> <ul style="list-style-type: none"> <li>– Workers hired through third-party recruitment agents, or Contract workers (i.e., those who are employed by staffing and labor agencies to directly hired workers) should be prioritized.</li> </ul>
8. Seasonality of production or service delivery		Production or service levels that fluctuate by season may suggest increased risk of temporary or casual labor. Particular attention should be paid to potential use of labor recruiters and labor contractors.
9. Types of jobs at the facility/worksite		Prioritize facilities with relatively higher concentrations of low-skilled, low-paid, hazardous, or otherwise undesirable work.
10. Presence of migrant workers	<input type="checkbox"/> Yes <input type="checkbox"/> No	Migrant workers are particularly vulnerable to forced labor in many contexts within supply chains.

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Profile Information		Risk Assessment Guidance
11. Origin country/countries of migrant workers		Evaluate risks relative to the country of labor supply. Reference materials such as <a href="#">Understand the Risks</a> and the <a href="#">US Department of State's Trafficking in Persons Reports</a> may support this analysis.