

UFLPA Compliance Checklist

Uyghur Forced Labor Prevention Act - Import Verification

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Purpose

Use this checklist to verify your imports comply with UFLPA requirements and avoid CBP detention/exclusion. Complete this for each product line with potential Xinjiang risk.

Section 1: Product Risk Assessment

High-Risk Products (Check all that apply)

- ☐ Cotton/cotton products (apparel, textiles, home goods)
- ☐ Tomatoes/tomato products (paste, sauce, canned goods)
- ☐ Polysilicon (solar panels, electronics)
- ☐ Other XUAR-produced goods (list): _____

Geographic Risk

- ☐ Product manufactured in China
- ☐ Product contains components from China
- ☐ Supplier has facilities in Xinjiang region
- ☐ Supplier uses subcontractors in China (unknown locations)

Risk Level: ☐ High ☐ Medium ☐ Low

Section 2: Supply Chain Mapping

Tier 1 Supplier Information

- ☐ Supplier name and full legal entity documented
- ☐ Factory addresses verified (all locations)
- ☐ Ownership structure documented
- ☐ Manufacturing locations confirmed (state/province level)

Supply Chain Visibility

- ☐ Raw material sources identified (origin country)
- ☐ Subcontractors/sub-suppliers listed (if any)
- ☐ Labor sourcing practices documented
- ☐ Multi-tier supply chain mapped to raw material level

Documentation Required

- ☐ Supplier declarations collected
- ☐ Material origin certificates obtained
- ☐ Factory audit reports reviewed
- ☐ Third-party verification completed

Section 3: Due Diligence Evidence

Supplier Certifications

- ☐ Signed UFLPA compliance declaration
- ☐ Xinjiang-free sourcing attestation
- ☐ Labor practices certification
- ☐ Annual recertification process established

On-Site Verification

- ☐ Factory audit conducted (within 12 months)
- ☐ Worker interviews completed (voluntary, private)
- ☐ No evidence of forced labor indicators found
- ☐ Payroll and recruitment records reviewed

Documentary Evidence

- ☐ Purchase orders traced to specific factories
- ☐ Bills of materials show non-XUAR origin
- ☐ Shipping records confirm stated origin
- ☐ Payment records align with declared suppliers

Section 4: Forced Labor Indicators Check

ILO Forced Labor Indicators (Verify NONE present)

- ☐ No restriction of movement (confiscated IDs, locked facilities)

- ☐ No retention of wages (deposits, delayed payment)
- ☐ No debt bondage (recruitment fees, wage deductions)
- ☐ No abusive working conditions (excessive overtime, poor safety)
- ☐ No deception (false promises, misleading recruitment)
- ☐ No physical/sexual violence or threats
- ☐ Workers can freely terminate employment
- ☐ No government-mandated labor transfer programs

Red Flags (Address if checked)

- ☐ Workers recruited through government programs
 - ☐ Use of "poverty alleviation" or "labor transfer" programs
 - ☐ Ethnic minority workers from Xinjiang in other provinces
 - ☐ Supplier refuses audit access or documentation
 - ☐ Inconsistent origin documentation
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Section 5: CBP Entry Preparation

Import Documentation

- ☐ Commercial invoice shows complete supply chain
- ☐ Entry summary includes supplier declarations
- ☐ Country of origin clearly documented (non-XUAR)
- ☐ Certificate of origin obtained (if applicable)

Supporting Evidence (Keep ready for CBP review)

- ☐ Supply chain affidavit prepared
- ☐ Factory audit reports compiled
- ☐ Due diligence documentation organized
- ☐ Legal counsel review completed (if high-risk)

ISF Filing

- ☐ Accurate manufacturer information provided
 - ☐ Country of origin stated (avoid "China" if possible - specify province/region)
 - ☐ Supplier contact information complete
 - ☐ Filed 24+ hours before vessel departure
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Section 6: Ongoing Compliance

Monitoring & Review

- ☐ Quarterly supplier compliance reviews scheduled
- ☐ Annual factory audits planned
- ☐ Supply chain changes documented immediately
- ☐ CBP UFLPA updates monitored (new enforcement priorities)

Internal Procedures

- ☐ Staff trained on UFLPA requirements
- ☐ Procurement team briefed on high-risk materials
- ☐ Import compliance SOPs updated
- ☐ Escalation process established (for detentions)

Emergency Response Plan

- ☐ CBP detention response team identified
- ☐ Customs broker/attorney contacts documented
- ☐ Document submission process established
- ☐ Alternative suppliers identified (contingency plan)

Section 7: Certification

Completed by: _____ Date: _____ Product Line/SKU: _____

Compliance Status

- ☐  **CLEAR** - All requirements met, low risk of detention
- ☐  **NEEDS IMPROVEMENT** - Gaps identified, action plan required
- ☐  **HIGH RISK** - Do not import until due diligence completed

Action Items (if applicable)

1. _____
2. _____
3. _____

Next Review Date: _____

Additional Resources

- **Full UFLPA Guide:** strixsmart.com/resources/blog/uflpa-compliance-guide
- **CBP UFLPA Resources:** cbp.gov/UFLPA
- **CBP Entity List:** Check for latest additions at cbp.gov

Need Expert Help?

Strix provides UFLPA compliance consulting, supply chain audits, and CBP detention response services.

Contact us: 📞 (406) 922-6600 ✉️ sales@strixsmart.com 🌐 strixsmart.com/solutions/compliance

This checklist is provided for informational purposes and does not constitute legal advice. Consult with a licensed customs attorney for specific compliance questions.

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