Guidelines for Enterprises on the Prevention of Forced Labor

Ministry of Labor

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1. Introduction

In recent years, there has been a significant increase in the international regulation of human rights in supply chains, with an upgrade in focus from ethical advocacy to legally binding trade restrictions and import control measures. As related domestic and international cases indicate, the existence of forced labor in the operations of enterprises and their supply chains can have adverse consequences, including but not limited to product seizures and import bans, which can have a serious impact on operations and corporate reputation. Against that backdrop, these Guidelines have been drafted to help enterprises develop mechanisms that prevent forced labor. At the same time, they also explain existing domestic legal provisions governing forced labor and related legal liabilities, while detailing local and international case studies involving forced labor. It is hoped that through these real-world examples, enterprises will develop a clearer understanding of forced labor. The following sections explain the importance of prohibiting forced labor in corporate operations and supply chain management, as well as the objectives behind the establishment of the Guidelines.

(1) The Importance of prohibiting forced labor

In terms of human rights, the "prohibition of forced labor" is universally recognized as a core labor standard and a fundamental right to which all workers are entitled. According to the definition adopted by the International Labour Organization (ILO), forced labor refers to "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily." Such behavior violates the most fundamental principles of human freedom and dignity and is often accompanied by other abusive practices, such as debt bondage, withholding of identity documents, withholding of wages, restrictions on freedom of movement, threats and intimidation. Forced labor not only constitutes a serious violation of labor rights but also represents a grave infringement of "human dignity, personal liberty, and the right to be free from exploitation." As such, the ILO adopted the Forced Labour Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1957 (No. 105), as well as the Indicators of Forced Labour, which not only require the elimination of forced labor but also provide definitions and criteria for assessing the existence of forced labor.

Concern over forced labor is fundamentally based on a desire to protect basic human freedom and dignity. At the same time, forced labor also violates a range of domestic laws, including the Labor Standards Act, Employment Service Act, Human Trafficking Prevention Act, and the Criminal Code. Moreover, forced labor often involves highly concealed illegal behavior, such as debt bondage and restrictions on the freedom of movement, with victims frequently reluctant to speak out due to their vulnerable circumstances, the language barrier, or fear of retaliation. As such, if related units have insufficient resources and expertise, it

can be difficult to comprehensively identify cases of forced labor and protect victims. Therefore, in addition to complying with domestic laws, external oversight and standards remain necessary. Indeed, the more corporate supply chains span multiple countries and different tiers of contractors and subcontractors, the more challenging it is for enterprises to prevent and identify forced labor risks. Although the 2024 U.S. Department of State "Trafficking in Persons Report," recognized Taiwan for its recent efforts to combat human trafficking, further improvements are still needed because related investigations indicate that foreign workers in Taiwan continue to face excessive recruitment fees, debt bondage, and poor working conditions.

Another issue closely related to the risk of forced labor is that of "fair recruitment," because unfair recruitment practices are often a source of forced labor. For example, when foreign workers are required to pay high recruitment fees themselves, it is extremely easily for them to become trapped in debt, leading to debt bondage, a form of forced labor. To address this issue, the ILO launched the Fair Recruitment Initiative in 2014 to promote fair recruitment standards, prevent unfair recruitment and exploitation, while also providing governments and enterprises with practical guidance. This initiative emphasizes the importance of monitoring and rigorously evaluating recruitment agencies (labor brokerages) to protect workers' rights. Based on the principles of fair recruitment, employers or recruiters, not workers, should pay all recruitment fees and related costs. Workers should never be required to pay recruitment fees and related costs, thereby avoiding debt burdens and economic coercion. Enterprises and recruitment agencies should also ensure that transparency of the recruitment process and provide clear, complete, and accurate information about working conditions, to ensure the job seeking party's right to know and right to choose. When the recruitment process adheres to fair recruitment principles the risk of forced labor is it significantly reduced.

(2) Objectives in formulating the 'Guidelines for Enterprises on the Prevention of Forced Labor'

In order to safeguard the basic dignity of workers, the international community has gradually come to view the elimination of human rights violations as a shared global responsibility and sought to implement this through a system of international norms. The United Nations Guiding Principles on Business and Human Rights (UNGPs) clearly point out that both states and enterprises have an inescapable responsibility to protect human rights. The Organisation for Economic Co-operation and Development (OECD), through its Guidelines for Multinational Enterprises on Responsible Business Conduct, also lists Human Rights Due Diligence (DD) as a standard of conduct to which enterprises should adhere, so as to reduce the adverse impacts their operations and supply chains have on human rights and the environment.

As international norms become increasingly clear, various industries and business alliances have begun collaborating with certification bodies to voluntarily establish human rights and social responsibility mechanisms, such as the SA8000 and the Responsible Business Alliance (RBA) Code of Conduct adopted in the electronics industry supply chain. At the same time, governments no longer rely solely on enterprises to embrace self-regulation, but rather strengthen the human rights responsibilities of enterprises through legislation, such as the United Kingdom and Australia's "Modern Slavery Act" and Germany's "Supply Chain Due Diligence Act" (LkSG). This development reflects the fact that preventing enterprises from gaining cost advantages at the expense of human rights has become a key focus in international trade and public policy. More recently, some countries have adopted punitive measures to curb forced labor through trade mechanisms, while requiring enterprises to be better able to identify, collect related evidence and trace human rights risks. For example, Section 307 of the U.S. Tariff Act, the Uyghur Forced Labor Prevention Act (UFLPA), and the European Union's Forced Labor Regulation (EUFLR) all reflect increasingly stringent expectations relating to the forced labor due diligence obligations of enterprises.

Given this global trend, international buyers and investors increasingly attach importance to labor compliance within supply chains, and external scrutiny has continued to strengthen. As a result, enterprises that fail to properly manage forced labor risks could face serious consequences, including trade restrictions, reputational harm, legal liability, and exclusion from markets. In that context, preventing forced labor is not only a fundamental corporate responsibility, it is also closely tied to the international competitiveness, brand reputation, and market access of Taiwanese companies. In response to these global trends, enterprises should systematically establish timely prevention mechanisms, while internalizing respect for human rights as an integral part of corporate governance and supply chain management. Accordingly, these guidelines seek to assist enterprises align their operations with the above international standards by establishing an action framework to prevent forced labor. This includes policy commitments, current situation reviews, countermeasures and improvement measures, risk identification, prevention strategies, and supply chain management, thereby implementing human rights protections and promoting the integrated development of industry sustainability and social responsibility.

The "Guidelines for Enterprises on the Prevention of Forced Labor" are based on a series of international standards, including the United Nations "Guiding Principles on Business and Human Rights," the International Labour Organization (ILO) core labor standards (including Conventions No. 29, Convention No. 105 and the Protocol of 2014 to the Forced Labour Convention), the OECD "Guidelines for Multinational Enterprises on Responsible Business Conduct," and the 2025 "Combating Forced Labour: A Handbook for Employers and Business"

jointly drafted by the ILO and the International Organisation of Employers (IOE). The key purpose of the Guidelines is to serve as a reference for enterprises when formulating policies prohibiting forced labor and establishing risk management mechanisms. They are also intended to help enterprises that have not yet developed labor rights policies better understand the concept of forced labor and establish an initial action framework. However, companies are also required to proactively review and verify compliance based on the latest applicable national or regional laws, trade regulations, trade agreements, business conduct standards, as well as mandatory import-country requirements, while continuing to strengthening due diligence to ensure compliance with related standards at all stages of the supply chain. In other words, these Guidelines provide enterprises with a foundation and starting point for action, rather than an end point of full compliance. Enterprises must also continue to focus on and conform to the latest developments in related laws and international standards, to be able to effectively govern human rights risks and further implement corporate human rights policies.

2. Forced Labor indicators and their meaning

(1) Definition of forced labor

According to the International Labour Organization (ILO) "Forced Labour Convention, 1930 (No. 29)," and the 2025 updated ILO "Indicators of Forced Labour," forced or compulsory labor is defined as: "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily." This definition is comprised of three core elements:

1. **Work or service**: This includes all forms of work, services, or employment, whether in the public or private sectors, formal or informal, or covered by a contract. It also covers activities that may not be recognized as "work" under the laws of certain countries, such as prostitution or begging.

2. **Menace of any penalty**: This refers to any form of coercion or penalty used to compel a person to work, including direct or indirect threats, legal or financial sanctions, and the loss of rights or privileges. Importantly, any assessment as to the existence of coercion should be assessed from the perspective of the person being threatened.

3. **Absence of voluntary consent**: This refers to the lack of free and informed consent to engage in work, or the inability to withdraw such consent at any time. In other words, a worker's ability to freely leave a job is restricted.

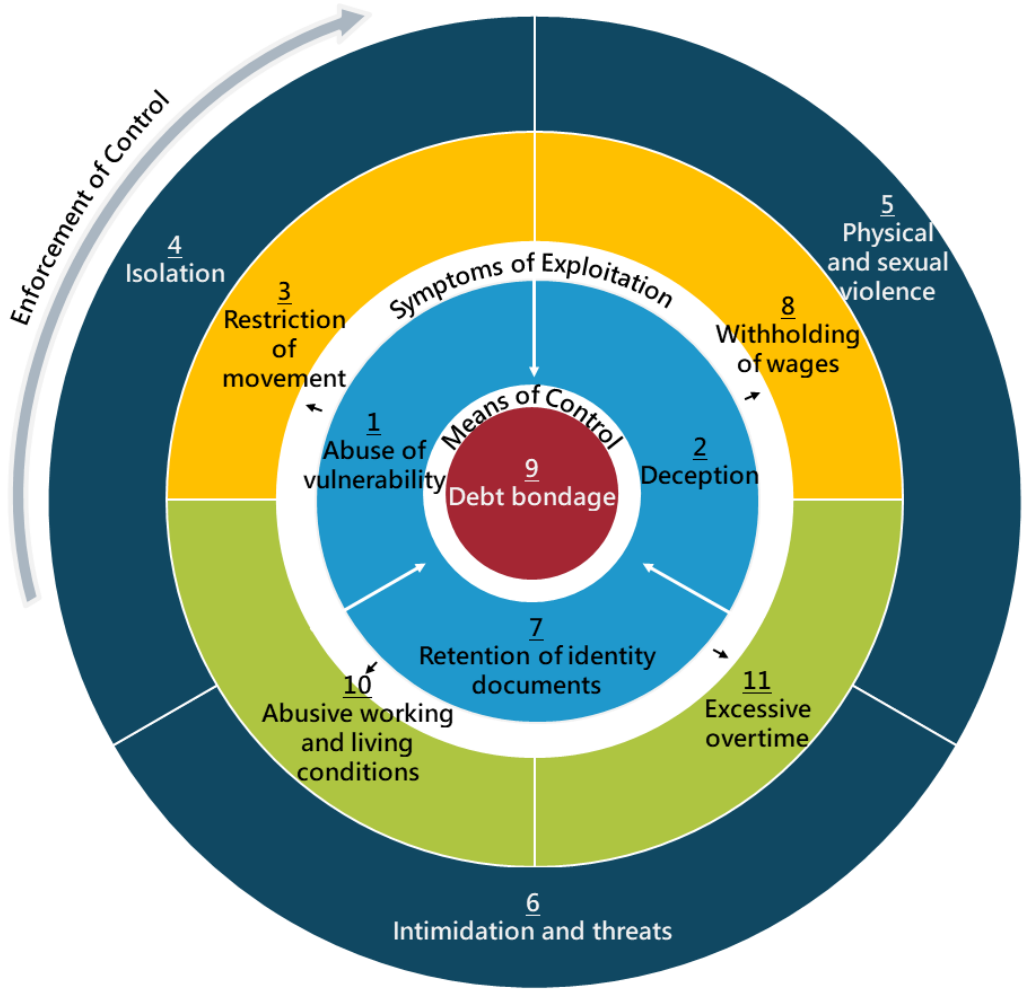
In practical terms, when conducting an inventory of internal risks at an enterprise, organizations can refer to the ILO's "Indicators of Forced Labour," initially published in 2012 and updated in 2025. This identifies 11 indicators of forced labour which in order are: abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime. This document has been widely used as an operational reference by countries around the world and helped governments, enterprises and different sectors of society to accurately identify conditions under which a worker-employer relationship can constitute forced labour. In addition, readers can also reference the case studies detailed in Addendum II to gain a better understanding of the diverse types of forced labour in specific real-world scenarios.

(2) 'Debt bondage' is the core of forced labour

Based on practical observations, these Guidelines consider forced labor to extend outwards from a core of "debt bondage." In so doing, it gradually encompasses various layered methods of control, including deception, restriction, exploitation and coercion. This layered structure demonstrates that forced labour does not originate from a single act but is rather the interaction of multiple mechanisms that together create systemic exploitation. As such, in practical assessments and the designing of related policy, it is extremely important to understand the way in

which the 11 indicators interact, with “debt bondage” considered the primary warning sign and basis for the making an informed judgment.

At the same time, the implementation of “fair recruitment” and the “zero-fees principle” is key to preventing workers from falling into debt bondage and then becoming victims of forced labour. Only by eliminating debt dependency and the improper charging of fees at source can the root causes of forced labour be removed, ensuring all workers are able to work under conditions of freedom, consent and dignity. The “concentric-circle diagram” below highlights the layers and interrelationship of the 11 indicators of forced labour:



ILO's Indicators of Forced Labour

1. Core layer: Debt bondage

Of all the indicators, Indicator 9 “Debt Bondage,” is viewed as the key core indicator. However, this does not mean that indicators in the inner, middle and outer layers of the diagram are less important; rather, it means that “debt bondage” is often the cause of many of the other indicators. Once workers fall into debt bondage due to high recruitment fees or other factors, they are extremely vulnerable, lose bargaining power and are thereafter forced to accept a series of exploitative actions.

2. Inner layer: Means of control

The inner layer represents the initial control mechanisms that pushes workers into situations of forced labor. These mainly involve deception and the exploitation of vulnerability, causing workers to enter into debt and dependency-based relationships. It includes three indicators:

(1) Indicator 1: Abuse of vulnerability
Employers or labor brokers exploit the vulnerabilities of workers (for example poverty, inability to speak a foreign language, lack of familiarity with local laws, or their status as an illegal migrant) to induce them to accept unreasonable debt or work conditions.

(2) Indicator 2: Deception
Workers who are already in debt or have other vulnerabilities urgently need to make income and so sign contracts under conditions of information asymmetry or are even miss led. After starting work and discovering that actual work conditions differ from what was promised, they are often already in an exploitative situation that is difficult to escape.

(3) Indicator 7: Retention of identity documents
The passports, ID, or other important documents of workers are confiscated and used as “collateral” for debt repayment, preventing them from freely leaving or seeking outside assistance.

3. Middle layer: Symptoms of exploitation

Once workers are constrained by debt and inner-layer mechanisms, employers often impose further forms of exploitation and restriction, ensuring they remain in a state of long-term forced labor. This includes four indicators:

(1) Indicator 8: Withholding of wages
Employers arbitrarily deduct, delay, or completely withhold wages.

(2) Indicator 11: Excessive overtime
Workers are forced to work excessive overtime. As a result, they are not only overworked for long periods of time but also lose the freedom to refuse overtime

or take rest.

(3) Indicator 10: Abusive working and living conditions
With workers lacking choices and opportunities to file complaints they are forced to endure unsafe, insanitary, or degrading working and living conditions, remaining under prolonged physical and psychological stress and unequal treatment.

(4) Indicator 3: Restriction of movement
To prevent workers from "escaping," employers strictly limit their freedom of movement, for example by locking them inside factories or dormitories.

4. Outer layer: Enforcement of control

The outermost layer indicates how employers employ social, psychological, and violent methods to further deepen the obedience and fear of workers, making it difficult for them to leave the exploitative environment. This includes three indicators:

(1) Indicator 4: Isolation
Workers are cut off from the outside world (family, friends, unions, or legal aid), leaving them isolated with no assistance and completely dependent on their employer.

(2) Indicator 5: Physical and sexual violence
When workers attempt to resist or disobey, employers or managers may resort to physical violence or sexual assault as the most extreme method of control.

(3) Indicator 6: Intimidation and threats
If workers complain, attempt to organize, or seek assistance they are threatened (for example with deportation, dismissal, or harm to family members in their home country), to force them to be silent and compliant.

(3) Meaning of Forced Labor Indicators

As forced labor is often concealed and takes a wide range of different forms it can be difficult to detect directly. As a result, the ILO has identified 11 indicators of forced labor to serve as an important foundation on which to identify potential victims, which include commonly seen coercive methods and non-voluntary characteristics found in forced labor scenarios. While the presence of a single indicator does not necessarily directly constitute forced labor, when multiple indicators exist simultaneously and a general assessment finds evidence of coercive methods, lack of freedom and absence of informed consent, that strongly suggests a worker faces a high risk of forced labor. The following section provides more detail on each of the 11 indicators:

Indicator 1: Abuse of vulnerability

When an employer or recruiter deliberately exploits a worker's vulnerable situation (such as irregular employment or residency status) to impose severe working conditions or work duties a worker would not otherwise accept, that is a classic case of "abuse of vulnerability." In some cases, employers or recruiters deliberately create vulnerabilities, for example by providing workers with drugs or alcohol to foster addiction and make them easier to control.

Other situations that increase a worker's vulnerability to forced labor include physical or mental disabilities, illiteracy or innumeracy, and a system that ties work or residence permits to a specific employer. Vulnerability can also originate in deception that creates multiple types of dependence, leaving workers dependent not only on work provided by one employer or recruiter but also for housing, food, and even employment opportunities for family members.

Although anyone can be subjected to forced labor due to vulnerability, certain groups are more susceptible than others. For example, foreign workers are three times more likely to be victims of forced labor than the general population.

Indicator 2: Deception

Deception refers to a failure to honor verbal or written promises made to workers.

Victims of forced labor are often recruited based on promises of better work opportunities. However, once they start work those promises are not fulfilled and they find themselves in harsh working conditions with little to no possibility of leaving. False promises may concern wages and work conditions, but they may also involve the nature or location of the work, accommodation and living conditions, promises to provide legal immigration status, the identity of the employer, or even educational opportunities. Generally, deception takes place when workers accept employment based on false promises or without their informed consent.

The risk of deception increases when there is no written contract or when the terms of the contract are unclear. In addition, if work is obtained through informal channels, proving deceptive practices may be even more difficult. Moreover, deception can still occur even after signing a contract. A common example involves foreign workers who sign an agreed-upon contract before departure but on arrival are forced to sign a "substitute contract" before they are permitted to start working. This second contract may be written in a language the worker does not understand and contain harsher labor terms or even include work duties that differ completely from those originally agreed.

Victims of forced labor resulting from deception also include children. For example, in the process of recruitment or labor arrangements, children may be deceived, or parents misled into believing their children will attend school when, in reality, they are made to work.

Indicator 3: Restriction of movement

Workers can face restrictions on their freedom of movement as part of the recruitment process (for example when in transit), at the workplace, or in employer-provided accommodation. One obvious example is locking workers inside the workplace. This not only violates their freedom of movement, but may also expose them to extreme danger if they are unable to leave the premises during a fire or other emergency. There are many ways in which the freedom of movement of workers can be restricted, including requiring them to be accompanied when they leave the workplace, limiting the length of time they can leave the workplace, allowing only employer-arranged transportation between the worker's dormitory and the workplace, imposing curfews, or the law banning them from leaving the country without the employer's permission.

Some restrictions may be justified for legal considerations, such as the installation of surveillance equipment or employing security guards in areas where there is high-value property or dangerous workplaces. However, such measures should always be reasonable and in accordance with the principle of proportionality.

Indicator 4: Isolation

Victims of forced labor are often separated or isolated from others, making them easier to control and preventing them from escaping or seeking assistance. Isolation can take many different forms. Victims can be placed in remote locations without knowing their exact location and with no means to leave. Work locations may be far from the nearest village or town, with no transportation available. Such situations are most likely to occur in rural areas or as part of illegal activities such as unlawful logging.

Workers can also be isolated in populated areas. For example, employers may confiscate mobile phones or other communication devices to prevent them contacting family members or seeking help. Family members may themselves be directly threatened to prevent them from attempting to contact workers. Restricting the rights of workers to participate in trade unions, religious activities, or community events is another way to maintain social isolation and prevent them from obtaining support or advice.

The risk of isolation is particularly severe for live-in family-based workers, because living in their employers' homes their movements, communications, and visitors can all be strictly controlled, and it is very difficult for external oversight to prevent such abuses. Working in the informal economy makes it even easier to isolate workers, as unregistered workplaces frequently seek to evade labor inspections and workers lack trade union protection.

Indicator 5: Physical and Sexual Violence

Subjecting workers to physical or sexual violence is unacceptable in any situation and is one of the key indicators of forced labor. In some situations, workers who disobey orders may be threatened with violence against their family, or be forced to watch managers inflict violence on coworkers in order to stop them complaining, trying to escape or seeking help from others.

Sexual violence can be used as a tool of control and humiliation. In cases of commercial sexual exploitation, rape is often used to "break down" victims' will to resist, create a sense of shame, and silence them, making them reluctant to seek help or report the abuse to which they have been subjected.

Workers subjected to violence may have obvious physical injuries, such as bruises or untreated wounds. Possible psychological symptoms include anxiety, fear, compliance, stress, or symptoms of post-traumatic stress disorder (PTSD). Repeated pregnancies or sexually transmitted diseases can also be warning signs of sexual violence. Kidnapping or abduction are extreme forms of violence that may be used to push victims into forced labor.

Indicator 6: Intimidation and threats

Victims of forced labor may be subjected to intimidation and threats whether they are complaining about working conditions, attempting to quit, or even before employment begins in order to instill fear and enforce compliance. Workers may even be coerced into accepting employment through intimidation or threats.

Other than threats of physical violence, other common forms of intimidation include:

1. Informal work or immigration status: "I'll report you to the authorities and you'll be deported."

2. Ignorance of laws and rights: "If you leave the residence, the police will arrest you." Such statements are designed to ensure workers do not trust law enforcement.

3. Economic dependence: Threats of harsher working conditions or withholding wages.

Threats may be directed at workers, but also their family members or coworkers: "If you disobey, just wait and see what happens to you or your family." Intimidation is often part of broader psychological violence, intended to deepen the vulnerability and compliance of workers, for example through constant insults, belittling and humiliation.

When assessing threats, any analysis should be based on the viewpoint and understanding of the worker. Even if threats are based on superstition (for example, "You will be cursed") or misinformation (for example, "If you contact

a trade union, you will be fired," or "Local labor inspectors cannot be trusted") they may be entirely believable to some workers and as such constitute powerful methods of coercion.

Indicator 7: Retention of identity documents

The retention of identity documents or travel documents is a commonly seen method of control, especially against foreign workers. When such workers lose their documents, they often fear deportation and so feel unable to seek assistance from the authorities. As a result, they may also be unable to change jobs, access essential services, or leave the country.

Some employers or labor brokerages indefinitely retain workers' identity documents under the pretext of safekeeping or claim they are needed for administrative procedures (such as visa applications). When evaluating such practices, the key is whether workers are able to freely access and retrieve their documents whenever they want without needing prior approval.

Indicator 8: Withholding of wages

Irregular or delayed payment of wages do not necessarily constitute forced labor. The "withholding of wages" refers to a situation where an employer deliberately and systematically withholds pay (including the withholding of wages for the purpose of forced savings or security deposits), used as a tool to force workers to remain in a place of work and prevent them from leaving. In such situations, workers often feel unable to quit a certain job because they fear losing unpaid wages.

When assessing this issue, the key factor is whether an employer deliberately withholds wages or fails to pay them in full as a way of restricting a worker's freedom to terminate the employment relationship or transfer employers. In this situation, an employer can use a range of bogus reasons to avoid paying wages, which in effect amounts to withholding wages. Examples include: claiming poor work quality, underreporting the amount of work completed, setting production targets that are impossible to meet, paying wages in kind instead of cash, fining workers for absences or alleged mistakes, and illegally or arbitrarily charging fees for work tools, food, accommodation, or recruitment.

However, proving wages have been withheld can be challenging. Payroll slips and records can be fabricated, or the bank accounts of workers can be controlled by the employer. In addition, in some cases, although wages are deposited into a worker's account, they may be forced to return the money in cash to the employer or a third party. This creates the appearance of compliance but is in fact the withholding of wages.

Indicator 9: Debt bondage

Debt bondage refers to a situation in which an individual is forced to work against his or her will to repay a debt owed to an employer or recruiter (labor brokerage). Some debts are deliberately manipulated so the amount to be repaid is far higher than the original debt, or even becomes impossible to ever repay. This can occur in the following situations: when repayment terms are unclear, workers are forced to pay excessive costs for food and accommodation, illegal wage deductions, accounts are falsified, or unlawfully high interest rates are charged. As a result, workers may become tied to an employer or creditor for an unspecified period, which could last an entire production season, several years, or even across generations.

Debt bondage is not necessarily caused by a debt incurred by oneself. In some cases, children are recruited to repay the debts of their parents, such as loans, and this is also viewed as a form of debt bondage. The debt could also originate in advance wage payments, or from money borrowed to pay recruitment fees or medical expenses.

In reference to debt incurred to pay recruitment fees, in its 2019 publication "General Principles and Operational Guidelines for Fair Recruitment and Definition of Recruitment Fees and Related Costs," the International Labour Organization (ILO) specifically notes that workers and jobseekers should not be charged or required in any form to cover recruitment fees or related costs.

In addition to the above forms of debt bondage, the international community pays particular attention to the issue of foreign worker debt arising from employment. Before going abroad to work, low-wage foreign workers are often forced to pay a series of fees, such as high recruitment fees charged by labor brokerages for arranging job placements. This forces those workers to take on debt to obtain employment opportunities and can also involve other illegal fees. Additional costs may also occur during employment placement and the employment process itself (for example medical check-ups, training, transportation, labor brokerage service fees etc.) In accordance with the ILO General Principles and Operational Guidelines for Fair Recruitment, the above costs should not be borne by foreign workers.

Indicator 10: Abusive working and living conditions

Victims of forced labor may be forced to accept demeaning work conditions (such as humiliating treatment, degrading conditions, or poor sanitation) or highly hazardous work conditions (including work that is difficult, dangerous or lacks appropriate protective equipment), in clear violation of labor laws and basic human rights. They may also be forced to live in a substandard environment that is overcrowded, insanitary and lacking in privacy.

Although poor living and work conditions do not automatically constitute forced labor on their own, such situations are frequently seen in forced labor cases. As

such, whenever workers face risks, such as inadequate protective equipment or training, lack of sanitation facilities, heating, running water, food, or any other conditions that endanger health, further investigation is required to determine whether workers are being forced to remain in such conditions due to coercion or other factors (such as unpaid wages).

Indicator 11: Excessive overtime

Excessive working hours alone do not automatically constitute forced labor, but when work hours exceed upper limits established by national laws or the provisions of collective agreements, the situation should receive stricter review. The ILO Committee of Experts on the Application of Conventions and Recommendations has pointed out that some workers accept excessive overtime (beyond the limits permitted by national laws) because they fear being fired, or because the demands of piece-rate wages and production systems require them to work long hours to earn the basic minimum wage.

In addition, deciding whether overtime constitutes forced labor can be complex. A key factor in any assessment is whether workers face penalties for refusing to work overtime, for example dismissal, blacklisting, or loss of future opportunities to work overtime.

In certain industries forced overtime is particularly common. Family based foreign workers and fishers may be on call 24 hours a day, seven days a week, with no leave or breaks. In the manufacturing sector, forced overtime is often linked to unrealistic production targets. When work hours are ill defined or there is no written contract, the risk of excessive overtime increases.

Excessive overtime may involve concerns about it being involuntary and related punishments. In addition, long work hours can also endanger the health and safety of workers, exposing them to a higher risk of injury, illness, and even death (from overwork).

3. Enterprise action plan framework

An “Enterprise Action Plan Framework” seeks to help enterprises plan a clear pathway for the gradual implementation and promotion of measures to prevent forced labor. The initial stage focuses on the company itself and its subsidiaries, with capacity-building undertaken through “phased implementation.” In the later stages, coverage is gradually expanded to high-risk and key suppliers, based on risk levels and management capability, and ultimately extended to the full value chain, thereby achieving the goal of preventing forced labor. To effectively promote the establishment of an enterprise action framework to prevent forced labor, it is recommended that prevention actions are taken in five distinct areas: policy commitment, current status review, countermeasures and improvement, risk identification and prevention strategies, and supply chain management. The main actions in each area are detailed below:

(1) Enterprise policy commitment

1. Enterprises should draft a “Human Rights Policy Commitment” or a “Zero Tolerance for Forced Labor” policy and publicly disclose it to all employees and external stakeholders (for example on the company’s official website). It is recommended that this document should be signed by the company’s top executive and be publicly issued to add weight to the firm’s official declaration and responsibility to society.

2. The policy commitment should be developed with reference to related international conventions and guidelines. It should explicitly prohibit the use of illegal or improper means such as violence, coercion, deception, withholding identity documents, debt bondage, restrictions on freedom of movement to force workers to engage in work, as well as any other practices that compel workers to provide involuntary labor.

3. Enterprises should proactively incorporate forced labor prevention regulations into work rules and the employee handbook and make them publicly accessible to all employees, while at the same time using internal training and guidance mechanisms to ensure managers and employees fully understand and implement related policies.

(2) Current internal status review

1. Companies should conduct regular reviews (including of subsidiaries and branch offices) to determine whether forced labor risks exist. This should cover recruitment processes, employment models, work hours, wages, retention of identity documents, as well as a range of work and living conditions. When conducting an internal review, enterprises are advised to reference the “Forced

Labor Risk Self-Assessment Checklist"[1] in these Guideline, and to examine each internal forced labor risk in accordance with the International Labour Organization (ILO) indicators of forced labor. However, the review should be based on a general assessment of whether multiple indicators exist at the same time, rather than reaching a conclusion based on a single issue.

2. When reviewing internal forced labor risks, enterprises should conduct a comprehensive evaluation, reviewing all relevant indicators. As forced labor risks are often not immediately visible, identification requires in-depth and detailed investigation. Initial work includes collecting internal company data and relevant records (such as work rules, labor contracts, payroll records, complaints, occupational health and safety regulations, and dormitory management rules).[2] These should be supplemented with on-site observations and anonymized surveys or interviews, to facilitate a deeper assessment and identification of forced labor risks.

3. In addition to establishing an action framework based on the Guidelines, enterprises may also in the future be subject to audits based on international standards such as RBA and SA8000. To prepare for third-party audits, the Guidelines also provide related information for reference purposes.[3]

(3) Countermeasures and improvement measures

1. If forced labor risks are identified within an enterprise, the company should immediately stop any inappropriate behavior and initiate an internal investigation, to identify risk links, assess risk level and scope of impact (number of people affected). Based on the level of risk, the company should then develop a concrete corrective action plan, establish implementation priorities, and assess any system deficiencies to prevent similar situations from recurring.

2. The corrective action plan should clearly detail improvement objectives, concrete corrective measures, responsible departments, and an implementation timetable, while establishing a monitoring mechanism to regularly review the implementation and efficacy of corrective measures, to ensure they are properly carried out.

3. Related remediation procedures should be provided for workers whose rights have been infringed. These include helping affected workers obtain compensation,

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[1] For more see Addendum 1 of the Guidelines.

[2] For more see documents listed in part four of the Guidelines.

[3] For more details see auditing standards and processes for major international codes of conduct listed in part five of the Guidelines.

such as the payment of unpaid wages, reimbursement for losses, the provision of medical, psychological, or daily life support.

(4) Regular monitoring of potential risks and prevention

1. Conduct regular assessments of forced labor risks, including investigations and monitoring of work or positions that present a high risk of forced labor. In addition, enterprises should also establish oversight mechanisms to conduct regular appraisals of cooperating labor brokerages to ensure the services they provide comply with fair recruitment principles and related legal norms.

2. Develop preventive countermeasures to address identified risk factors, for example by strengthening work-time recordkeeping, enhancing management systems and internal control measures, establishing employee consultation and complaint channels, while signing contractual provisions with cooperating labor brokerages to ensure compliance.

3. Strengthen training for employees and senior management, and establish complaint reporting mechanisms and whistleblower protection measures.

(5) Supply chain management

1. Enterprises and their subsidiaries should first establish the internal capacity needed to effectively implement policies and action plans prohibiting forced labor, including conducting a current status review and investigation, improving employee and recruitment process management, and strengthening complaint handling.

2. Enterprises should extend these efforts beyond their own operation in stages, based on their management capacity, risk assessment results, and available resources. The first stage is to identify and conduct an inventory of risks within the company and its subsidiaries and strengthening internal management. The next stage should prioritize suppliers with higher forced labor risks, greater human rights impacts, suppliers with higher output value, or strategic importance, bringing them within the scope of monitoring and audit work, while encouraging them to sign policy commitments and participate in training programs. Through annual rolling reviews, enterprises will then incrementally promote adoption of these action plans by all cooperating suppliers.

3. Enterprises are encouraged to combine industry associations and third-party resources to strengthen their ability and that of their supply chain partners to identify and address forced labor risks. They should establish implementation roadmaps and target timetables, and annually publicly disclose progress, scope and efficacy, including policy implementation, number of personnel trained, supplier coverage rates and future action plans.

Human rights issues extend beyond forced labor, with other core labor rights touching on the prohibition of child labor, freedom of association and collective bargaining, health and safety, as well as fundamental rights such as personal liberty/security and privacy, all of which should be incorporated into the human rights policies of enterprises. If a company seeks to fully implement human rights protections advocated by the international community, it should establish a Human Rights Due Diligence (HRDD) mechanism that systematically assesses risks and extends such work through the entire value chain. When Taiwanese enterprises formulate corporate human rights policies or implement HRDD measures, those firms can reference the “Human Rights Due Diligence Handbook for Enterprises” published by the Ministry of Economic Affairs.

4. Enterprise self-assessment items and reference documents

The first part of the Guidelines outlined the meaning and key assessment focus of the ILO's 11 indicators of forced labor. However, although the indicators provide a basic framework for identifying forced labor behavior, in practice enterprises can be in full compliance with legal requirements and yet still overlook potential forced labor risks in their systems operations or daily management. As such, other than publishing an internal human rights policy that includes a commitment to prohibit forced labor, it is also necessary for companies to adopt more detailed and systematic risk assessment methods, comprehensively review internal management and identify potential forced labor risks, to facilitate the adoption of preventive and corrective measures.

On this basis, the Guidelines utilize the ILO's 11 forced labor indicators as a framework to determine assessment items and recommended reference documents for each individual indicator, to be used by enterprises when conducting internal risk assessments. The documents listed are for illustrative purposes only, as enterprises should select appropriate documentation as a basis for evaluation based on their own real world business operations, management systems and risk characteristics. It should be noted that in addition to the reference documents identified for each indicator, enterprises can also identify situations with potential forced labor risks through the following documents:

- **Complaint mechanisms or complaint forms**: Enterprises should establish grievance and complaint channels that are functionally comprehensive, highly accessible, secure and confidential. Workers should be made aware that these mechanisms exist and be able to submit complaints in a language with which they are familiar. In addition, companies should be able to identify whether forced labor risks exist from complaint records; ensure previous complaints have been properly addressed, with related outcomes used as a foundation for future risk mitigation processes.
- **Audit reports**: Review red flags on high-risk issues detailed in past internal and external audit reports.
- **Enterprise policy commitments and management documents**: Review whether the enterprise has established occupational health and safety policies and risk assessment measures in accordance with the law, or already signed a human rights commitment or social responsibility statement.

To enhance an enterprise's self-assessment capability, companies should use the "Forced Labor Risk Self-Assessment Checklist" in the Guidelines.[4] Each item can be measured against their current practices to indicate whether risks exist. When necessary, the assessment can be supplemented with interviews,

[4] For more details see Addendum 1 of the Guidelines.

anonymized surveys, or other methods for verification purposes. If forced labor risks are found, enterprises should immediately stop all inappropriate actions and prioritize corrective measures based on the severity and impact of the situation (for example by providing reasonable compensation or reimbursement of recruitment fees). The following sections lists the assessment items for each one of the 11 forced labor indicators, together with the recommended reference documents.

Indicator 1: Abuse of vulnerability

Abuse of vulnerability refers to situations in which an employer deliberately exploits a worker's vulnerable circumstances (such as being an illegal migrant, the language barrier, disabilities, or extreme poverty), to compel them to work. These risks are often concealed within informal employment relationships or management measures directed at specific groups of workers. When conducting self-assessments, enterprises should pay attention to whether "differential treatment" is reasonable or whether the dependence of workers is being used to facilitate exploitation. As detailed below this indicator contains seven assessment items:

No.	Assessment Items
1-1	Job assignments are based on objective standards such as skills and professional qualifications, with no differential treatment based on personal characteristics such as ethnicity, nationality etc.
1-2	There is no harassment, bullying or discrimination in the workplace. Managers do not exploit employees' vulnerabilities (language barrier, advanced age, poor physical or mental health, pregnancy) to treat them inappropriately.
1-3	Workers are free to choose their own accommodation and food and not subject to restrictions or mandatory arrangements made by the company, employer, or labor brokerage.
1-4	Workers retain their original identification documents and independently undertake administrative procedures required to maintain their legal status.
1-5	Recruitment and remuneration policies are fair, and workers are not treated differently because of their special life circumstances (being displaced by conflict or impacted by a natural disaster).
1-6	Contracts with domestic and overseas labor brokerages should be clearly written to prohibit charging workers fees, withholding workers' identity documents, restricting resignations, and should also contain provisions on sanctions to be imposed on labor brokerages that break the rules and contract termination.
1-7	Domestic and overseas labor brokerages are subject to regular audits/spot

No.	Assessment Items
	checks (these can involve interviews with worker or on-site assessments in countries of origin).

When assessing the above items, enterprises can refer to the following documents:

- Employee roster: Review the make-up of the workforce, nationality and contract types, to identify employees with a particular legal status or residency situations.
- Photocopies of passports and identity documents: Identify foreign workers with informal status or high-risk backgrounds.
- Labor contracts/work rules: Review whether workers with a particular status (such as foreign workers) are subject to unequal treatment.
- Disciplinary records: Review whether disciplinary action disproportionately targets vulnerable groups or if wage deductions or additional work are used as punishment.
- Recruitment policy: Review foreign worker recruitment measures and contracts with labor brokerages to determine whether workers' vulnerabilities have been exploited (for example by withholding documents), and keep a record of labor brokerage audits and legal violations.

Indicator 2: Deception

Deception is a common method to induce forced labor. It occurs when employers or labor brokerages make false promises during the recruitment process regarding working conditions (wages, work hours, work location) in an attempt to get workers to accept employment, based on the premise that once they arrive at the work location and discover the truth leaving is difficult. The focus of any assessment is to compare whether the promises made (whether in advertisements or verbal communications) are consistent with the actual conditions (contract and payroll records). This indicator includes three assessment items:

No	Assessment Items
2-1	Actual working conditions (including wages, work location, accommodation) are consistent with commitments made during the recruitment process.
2-2	When workers arrive at the place of work, information on local living conditions and workers' rights are provided in their native language or another easily understood language.
2-3	Information is transparent throughout the recruitment process, so workers accept a job on the basis of full knowledge and free choice.

When assessing the above items, enterprises can refer to the following documents:

- Employee roster: Compare the roster with the actual workforce on-site to verify whether any workers are not listed in official records.
- Labor contracts: Check whether contract terms are consistent with actual practices (wages, job duty descriptions, job explanations). Contracts should be written in a language workers can understand and include a signed acknowledgment of receipt to prevent contracts being substituted after workers arrive in Taiwan.
- Recruitment advertisements: Check whether the advertised conditions are consistent with the employment contract and actual working conditions.
- Pay slips: Check that actual wages paid match the wages promised during the recruitment process.
- Recruitment policies: Review contracts with labor brokerages to ensure information transparency and prohibit concealment during recruitment.
- Labor orientation and related training records: This should include information on living in Taiwan, workers' rights, complaint mechanisms and attendance records, in the workers' native languages or a language they can readily understand.

Indicator 3: Restriction of movement

Restriction of movement refers to a situation where an employer limits the freedom of movement of workers through physical barriers, strict surveillance, or administrative measures. Examples include unreasonable confinement, enhanced and frequent security monitoring, or mandatory transportation and accommodation arrangements. Any assessment focuses on whether security measures are proportionate and do not constitute deprivation of personal liberty. This indicator has five assessment items:

No	Assessment Items
3-1	Workers are able to freely enter and leave the workplace.
3-2	No measures are adopted in the workplaces or dormitories to constrain the movements of workers, such as locked doors, fences or security personnel.
3-3	Surveillance equipment is used only for legitimate security purposes and not with the intent of restricting the freedom of movements of workers.
3-4	Workers are free to choose their own means of transport and vehicles provided by the company are just one option. Workers are not forced to take certain vehicles and not accompanied or monitored when traveling.
3-5	Workers are free to choose their own place of residence and not required to live in dormitories designated by employers or labor brokerages.

When assessing the above items, enterprises can refer to the following documents:

- Workplace layout diagrams: Check whether there are watchtowers, fencing or unreasonable security supervision preventing workers from freely coming and going.
- Work rules/security measures: Review whether regulations impose disproportionate restrictions on workers coming and going to and from the work place and accessing bathrooms.
- Dormitory management rules/life rules: Review whether there are unreasonable measures restricting the movements of workers (such as curfews).
- Identity document policies and access records: Companies are not permitted to withhold the identity documents of workers, must grant access when requested and keep records when employers temporarily hold such documents on behalf of workers.

Indicator 4: Isolation

Isolation aims to separate workers from their social support network, leaving them with nowhere to seek assistance when being exploited. This often occurs in remote factories and on fishing vessels, through confiscation of mobile phones or restrictions on social interaction. The focus of any assessment is whether workers' "right to communicate externally" and "access to convenient transportation" are improperly limited. This indicator has seven assessment items:

No	Assessment Items
4-1	Measures have been taken to reduce the inconvenience faced by workers who work in a remote area or factory.
4-2	Workers are free to communicate with family members, social groups or NGOs, as long as doing so does not interfere with their work.
4-3	The personal communication devices of workers are not confiscated or kept by a third party.
4-4	The social life of workers is respected, and no policies or rules are imposed to restrict such activities.
4-5	Language or cultural adaptation measures are provided to help foreign workers be part of the local community.
4-6	Workers employed on fishing vessels are provided with basic communication facilities (such as internet access or public telephones). Any charges should reflect market rates.
4-7	All business premises are legally registered, allowing law enforcement or third-party organizations to locate the premises and determine the circumstances of workers at any time.

When assessing the above items, enterprises can refer to the following documents:

- Workplace layout diagrams: Check whether facilities are located in isolated areas far from cities that lack transportation services.
- Labor contracts/work rules: Review whether there any rules restricting workers' activities or communications when they are not working.
- Factory/company registration certificates: Check that the operational workplace is legal.
- Others: Review related records (training, transportation services, facilities) to confirm efforts to reduce geographic isolation and promote the integration of foreign workers into local communities.

Indicator 5: Physical and sexual violence

Physical and sexual violence are the most direct means of controlling workers involved in forced labor. This includes physical assault, sexual harassment, or being forced to take drugs. Enterprises should not only passively avoid the occurrence of violence they should proactively establish a "zero-tolerance" policy and a secure complaint and protection mechanism. Any assessment focuses on whether medical records or complaint cases reveal signs of violence that have not been properly addressed. This indicator has five assessment items:

No	Assessment Items
5-1	Preventive mechanisms are in place to prevent managers from abusing their authority through coercion or violence
5-2	Workers are not controlled through the use of drugs or alcohol
5-3	A policy of "zero-tolerance" on workplace violence and harassment has been effectively incorporated into training and day-to-day management
5-4	Workers who experience workplace violence or harassment can file complaints in their native language or another language with which they are familiar. The complaint procedures are clear and confidential.
5-5	Disciplinary measures are fair, proportionate and do not involve violence.

When assessing the above items, enterprises can refer to the following documents:

- Occupational injury and medical records: Check for unusual injuries or written clues indicating physical abuse.
- Complaint processing and complaint reports: Review complaints concerning sexual harassment, discrimination, or physical violence, and confirm that complaint channels are "diverse" and "confidential."
- Training records: Review management training and workplace bullying prevention training records for new and existing employees.
- Labor contracts/work rules: Check that disciplinary measures are proportionate and do not involve violence.

Indicator 6: Intimidation and threats

Intimidation and threats constitute psychological coercion, and involve employers compelling workers to comply through threats of dismissal, reporting their illegal immigration status, threats to harm family members, or withholding wages. These risks are often concealed and typically only identified through worker interviews and reviews of disciplinary records. Any assessment focuses on whether management style relies on "fear" as a means of control. This indicator has five assessment items:

No	Assessment Items
6-1	Managers do not engage in any form of intimidation, threats, or verbal abuse toward workers.
6-2	The disciplinary system does not include coercive measures such as withholding wages or reducing workers' living standards.
6-3	Managers or labor brokerages do not coerce workers into obeying by threatening to harm their family members or friends.
6-4	Managers or labor brokerages do not use intimidation or coercion to prevent workers from seeking to terminate their employment.
6-5	Workers have access to multiple complaint channels with clear complaint rules and procedures, and a high degree of confidentiality, allowing them to file complaints without fear of exposure, intimidation, threats, or any form of retaliation.

When assessing the above items, enterprises can refer to the following documents:

- Disciplinary methods and disciplinary records: Review whether disciplinary actions involve violence or threats and if penalties are proportionate.
- Complaint procedures and records: Review reports on whether workers have been subject to threats or psychological coercion and confirm whether complaint mechanisms are "diverse" and "confidential."
- Training records: Review management training and workplace bullying prevention training records for new and existing employees.
- Resignation and employment termination related records: These include documents such as voluntary resignation applications, exit interview records/reasons, final payroll settlements, and handover documentation, that demonstrate workers were able to resign without punishment.

Indicator 7: Retention of identity documents

Retaining workers' identity documents (such as passports or residence permits) is a common way of restricting their freedom of movement and ability to leave their employment. Even if a worker has signed a document authorizing the employer to hold documents on their behalf, the arrangement could still constitute a risk of forced labor. Any assessment will focus on whether workers hold their own identity documents and whether the enterprise has a clear policy prohibiting the retention of such documents. This indicator has two assessment items:

No	Assessment Items
7-1	The enterprise does not retain workers' ARCs, passports, or travel documents for any reason.
7-2	Where workers voluntarily agree to have their documents held by the enterprise a return period should be specified, and workers retain the unconditional right to retrieve their documents at any time.

When assessing the above items, enterprises can refer to the following documents:

- Identity document management measures and procedures: Review whether the enterprise has any rules or authorization forms relating to the retention or restriction of employee access to identity documents, or a policy and guidance records prohibiting the retention of identity/ travel documents.
- Foreign Worker Living Care Service Plan: Review whether worker dormitories are equipped with lockable lockers/safes, or other appropriate storage spaces where workers can keep their identity documents and property.

Indicator 8: Withholding wages

Wages are withheld to compel workers to continue working to receive their pay or as a method of punishment. Examples include an unjustified delay in paying wages, unlawful deductions, payment in kind, or retention of "deposits." Any assessment should focus on the transparency of wage structure and whether deductions are lawful and made with the consent of workers. This indicator has eight assessment items:

No	Assessment Items
8-1	Employment contracts clearly specify how wages are calculated and method of payment in a language understood by the worker.
8-2	Wages are paid in full and on time on a designated payday.
8-3	Workers receive a detailed pay slip (including all payments and deductions) in a language they understand every payday.
8-4	Wages are directly paid into a bank account opened and controlled by the worker.
8-5	No deductions are made from wages as deposits, penalties, security payments, or compensation.
8-6	All lawful deductions (such as board and lodging) are specified in the employment contract in a language understood by the worker and itemized on the pay slip.
8-7	A verification mechanism is in place for dispatched workers (including outreach foreign workers) to ensure their wages are paid in full.
8-8	Can workers access attendance records, overtime records, and other documents used to calculate wages at any time?

When assessing the above items, enterprises can refer to the following documents:

- Payroll and payment records: Review whether wages are paid on time and directly deposited into the personal accounts of workers.
- Pay slips: Check and confirm company records and the pay slips held by workers are the same.
- Attendance records: Check whether workers possess copies of attendance records or are able to access the attendance system.

Indicator 9. Debt bondage

Debt bondage occurs when workers are forced to work to repay debts (generally high recruitment fees, wage advances, or high-interest loans), preventing them from freely terminating their employment. It is also one of the most common forms of modern slavery. Any assessment focuses on ensuring workers do not pay any recruitment-related fees during the hiring process to ensure they do not take on debt as part of job seeking. This indicator has two assessment items:

No	Assessment Items
9-1	Workers are not required to repay wage advances or loans through the provision of labor.
9-2	The employer-pays principle is followed, with enterprises bearing all recruitment-related costs. If it is discovered that workers have paid such costs, there should be a reimbursement or remediation process through which the worker is reimbursed.

When assessing the above items, enterprises can refer to the following documents:

- Pay slips: Check whether recruitment fees, wage advances, or unreasonable board and lodging fees are deducted from wages.
- Labor recruitment and employment-fee payment records: Check whether recruitment and employment related labor brokerage fees, documentation/visa fees and transportation expenses are charged.
- Loan and wage advance records: Check whether workers are charged unusually high interest rates on loans or required to pay a deposit.
- Recruitment policy: Check whether contracts with labor brokerages contain provisions that stipulate no fees can be charged to applicants or workers as part of the recruitment process, or there is certified documentation indicating that fees already paid by workers are reimbursed, in accordance with fair recruitment principles.

Indicator 10: Abusive working and living conditions

Abusive conditions refer to workplaces or accommodation that are poor and can even endanger a worker's health or safety. This situation generally indicates an employer's disregard for the dignity of workers. Examples include hazardous workplaces, overcrowded or dirty dormitories, with inadequate basic sanitation facilities. Any assessment focuses on workplace inspections and a review of safety records to ensure conditions meet basic human rights standards. This indicator contains has seven assessment items:

No	Assessment Items
10-1	Safety training and notices are provided in languages workers can understand.
10-2	Workers operating dangerous machinery have received appropriate training and hold the required certification.
10-3	Workers are provided with necessary personal protective equipment (PPE), which is regularly replaced.
10-4	Working and living conditions meet the need for human dignity are not crowded, unsanitary or lacking in privacy.
10-5	Dormitories provide clean water, adequate sanitation facilities and are located away from flammable, explosive, hazardous materials and other dangerous areas, including those where there is excessive vibrations or noise.
10-6	Workers are free to choose where they live and not forced to reside in designated accommodation.
10-7	Workers have channels to complain about their working and living conditions.

When assessing the above items, enterprises can refer to the following documents:

- Occupational injury and illness reports: Check whether workplace injury occurrence is unusually high or there is evidence of underreporting.
- Complaint records: Check whether there is a high number of complaints about poor conditions that have not been resolved.
- Maintenance and inspection records: Ensure fire-fighting equipment, work equipment and accommodation facilities are regularly maintained and upgraded.
- Workplace layout diagrams: Inspect convenience of access to sanitation facilities, drinking water, and medical support.
- Dormitory management regulations/life rules: Draft rules on keeping the living environment clean, communicable disease prevention and prohibiting smoking.
- Training records: Check that training is provided in a language workers can understand

Indicator 11: Excessive overtime

Excessive overtime constitutes forced labor when it is accompanied by "coercion," (such as threats of dismissal, wage deductions, or indirect pressure through extreme production targets). Enterprises are required to demonstrate that overtime is voluntary and that total work hours remain within legal limits. Any assessment focuses on the accuracy of worktime records and whether mechanisms exist that allow workers to refuse overtime. This indicator has three assessment items:

No	Assessment Items
11-1	Workers receive statutory leave and reasonable rest breaks at work.
11-2	Workers have the right to refuse overtime. As such, any extension of work hours by an employer requires the consent of workers. Enterprises should also implement overtime review procedures and controls to ensure total work hours remain within legal limits and there is no excessive overtime.
11-3	All overtime worked by employees is paid in accordance with related laws or compensatory leave provided.

When assessing the above items, enterprises can refer to the following documents:

- Employee roster: Check the ratio of staffing levels relative to production targets.
- Work-time (attendance): Check to determine whether work time has exceeded the legal limit and whether there are leave days, or continuous on-call arrangements.
- Overtime application and consent forms: Check that overtime is voluntary.
- Employment contracts and work rules: Do these clearly detail a working-time system, rest periods, and different categories of leave in compliance with local labor laws.
- Resignation, employment termination, and final settlement records: Check that workers can choose to resign, receive resignation interviews, settle outstanding pay and handover records. Confirm there are no overtime, production target (or handover procedures), wage deductions or other measures that seek to prevent workers resigning or punish them for doing so.

5. Audit standards and processes for major international codes of conduct

Although the Guidelines provide enterprises with a plan of action and preparatory framework to follow, they do not replace official standards or audit requirements, rather they help companies establish the fundamental knowledge and internal management practices needed during the initial stages, enabling them to further enhance and adjust their systems in accordance with different audit or certification systems. Against a backdrop of increasing global supply chain transparency and awareness of corporate social responsibility (CSR), the elimination of "forced labor" has become a common demand among brands, investors and consumers. In response, international industry alliances, commercial organizations and certification bodies have developed codes of conduct and established oversight mechanisms. However, the design of these standards reflects the characteristics and focuses of different industries, which leads to clear differences in their evaluation mechanisms. As such, these differences extend beyond definitions, auditing and verifying forced labor risks and impact the overall scope of auditing. Many standards examine not only labor and human rights but also the environment, business ethics etc. resulting in a more comprehensive evaluation.

To help enterprises better understand such differences, the Guidelines compare four important international codes of conduct: the Responsible Business Alliance (RBA), SA8000, Sedex Members Ethical Trade Audit (SMETA), and the Fair Labor Association (FLA). By examining the distinctions between these standards in terms of the industries where they are applied, key focus areas and audit methods, enterprises can more accurately determine their own optimal direction. For a detailed comparison, please refer to the table below titled "Comparison of Target Businesses, Audit Coverage and Methods Adopted by Major International Codes of Conduct."

1. **Responsible Business Alliance (RBA)**: The RBA primarily applies to the electronic product supply chain and has expanded to industries such as automobiles and toys. It has the broadest focus of the four standards, covering labor, health and safety, environment protection, business ethics and management systems. Audits are conducted by designated third-party audit firms through the Validated Assessment Program (VAP) and audit results are issued based on a numerical scoring system.

2. **SA8000 (Social Accountability 8000)**: SA8000 is applicable across a wide range of industries, though in practice it is most commonly used in the manufacturing and textile sectors, focusing primarily on labor rights and social accountability. Auditing is certification-based (similar to ISO certification), with enterprises voluntarily engaging an accredited third-party certification body to conduct an audit.

3. **Sedex Members Ethical Trade Audit (SMETA)**: SMETA is widely used throughout global supply chains, particularly in the retail, food and textile industries. One of its distinguishing features is it provides flexibility: enterprises can choose either the basic 2-Pillar Audit, (which covers labor standards and health and safety), or the more advanced 4-Pillar Audit (which adds environment and business ethics evaluations). SMETA is not a certification mechanism but rather produces an audit report. Because SMETA considers audit results that are more than 24 months old to be no longer a valid assessment of current workplace conditions, it recommends that high-risk suppliers should be audited annually, medium-risk suppliers every two years, while there is no recommended audit frequency for low-risk suppliers, leaving the determination to the purchasing company.

4. **Fair Labor Association (FLA)**: The FLA is primarily applicable to brands and manufacturers in the apparel, sporting goods and college licensed products industries. Its core focus includes labor rights, freedom of association, wages, and work hours. Rather than certifying individual factories, the FLA grants accreditation based on the human rights and supply chain governance of "brands/enterprises." The FLA appoints independent auditors which employ an Independent External Assessment (IEA) mechanism to conduct "random sampling" of the supply chain to verify the effectiveness of a brand's supply chain management and its ability to implement improvements.

Comparison of Target Businesses, Audit Coverage and Methods Adopted by Major International Codes of Conduct

Code of Conduct	**Target businesses**	**Key Focus Areas**	**Audit Methods**
RBA (Responsible Business Alliance)	Primarily targets companies in the electronic product supply chain. Also extends to the automobile, toy, aerospace, and wearable technology sectors.	Labor; health and safety; environment; business ethics and management systems	Companies register on the RBA website, after which a Validated Assessment Program (VAP) audit is conducted by an RBA-designated independent third-party. Audit results are issued based on a numerical scoring system.
SA8000 (Social Accountability 8000)	Targets a broad range of industries, though in practice mainly the manufacturing and textile sectors.	Labor and social accountability	Enterprises can engage an accredited third-party certification body to conduct the audit. SA8000 is a certification-based system (similar to ISO certification),
SMETA (Sedex Members	Targets enterprises in global supply	SMETA offers two audit	1. Enterprises engage an accredited independent third-party firm to

Code of Conduct	Target businesses	Key Focus Areas	Audit Methods
Ethical Trade Audit)	chains, though in practice is mainly adopted in the retail, textile and apparel, and food industries.	options: 2-Pillar (Basic) and 4-Pillar (Advanced) audits. 1. The 2-Pillar audit covers only labor standards and health & safety. 2. The 4-Pillar audit expands the scope to include environmental management and business ethics.	conduct the audit. 2. SMETA is not a certification system, it is an audit report. 3. Although there is no official mandatory audit interval, SMETA recommends that medium and high-risk suppliers undergo audits every one to two years, depending on their risk level.
FLA (Fair Labor Association)	Targets brands and manufacturers in the apparel, sporting goods, and college-licensed products sectors.	Labor rights; working conditions; freedom of association; wages; work time	**Accreditation Scope**: The FLA accredits a **c**ompany/brand's human rights and supply chain governance system. **Execution**: An independent external assessment is conducted by auditors appointed or recognized by the FLA. Accreditation is granted after the enterprise completes any required corrective actions. **Follow-up mechanism**: Accredited enterprises are required to accept follow-up monitoring and regular cyclical reassessment/reevaluation. In addition, the FLA employs an Independent External Assessment (IEA) mechanism to conduct random sampling of supply chain factories to verify effective implementation of its standards. “Accreditation is therefore not granted because a single factory passes an audit.”

Source: Compiled by the authors of the Guidelines.

Because of differences in the design concepts, implementation methods and evaluation criteria that inform the audit and certification mechanisms of the various codes of conduct, it is important for enterprises to understand how these systems operate in practice. The following sections provides a more detailed introduction to the audit standards and verification or audit processes of the major

international codes of conduct discussed above:

1. RBA (Responsible Business Alliance) Audit Process and Forced Labor Prevention Criteria

The RBA's Validated Assessment Program (VAP) consists of four main stages and its core focus is "numerical scoring" rather than a simple pass/fail certification model.

- **Stage 1: Registration and self-assessment**

Enterprises are required to register an account on the RBA-Online platform, pay the related fees and complete a "Self-Assessment Questionnaire" (SAQ). This enables companies to identify and evaluate their own compliance risks before an official audit is started.

- **Stage 2: Launching an on-site assessment**

After an enterprise submits its SAQ, the RBA assigns an approved independent third-party audit company and determines a timetable to conduct an on-site assessment. After auditors arrive at the enterprise (plant) they evaluate compliance with the RBA Code of Conduct through employee interviews, document reviews and on-site observations.

- **Stage 3: Report and scoring**

After the on-site assessment is completed, the enterprise receives a detailed audit report and an overall score. The RBA assigns a score based on the report and the report details all failings and classifies them according to their severity as "Priority," "Major" or "Minor." This then serves as a basis for companies seeking to prioritize and implement improvement measures.

- **Stage 4: VAP Recognition Program**

The primary value of the on-site assessment is that it identifies and corrects failings. To commend enterprises that demonstrate a commitment to corporate social responsibility through the VAP process, the RBA provides three levels of Recognition:

- Platinum Recognition: VAP score of 200 or above, with all Priority, Major and Minor failings resolved.
- Gold Recognition: VAP score of 180 or above, with all Priority and Major failings resolved.
- Silver Recognition: VAP score of 160 or above, with all Priority failings resolved.

To ensure enterprises comply with the RBA's prohibition of "forced labor" at

every stage of the employment cycle, including recruitment, hiring, management, and leaving the company, they are expected to establish clear policies, complete procedures, and traceable management records, in accordance with the compliance requirements detailed in the RBA Code of Conduct. The table below details the RBA's main requirements relating to the prevention of forced labor. These serve as a core standard for companies when conducting human rights due diligence, establishing internal management systems, in response to RBA VAP Version 8.0.2 audits.

RBA VAP Version 8.0.2 “Prohibition of Forced Labor” Requirements

A. Policies and management

1. Establish a written policy that clearly prohibits forced labor, debt bondage, indentured labor, human trafficking, and forced prison labor.
2. Communicate the policy to suppliers, contractors and labor brokerages, and require them to adopt and implement it.
3. Regularly monitor the degree to which the policy is implemented.
4. Include a policy commitment that workers will be charged no recruitment, hiring, or placement fees.
5. Make a commitment that if any prohibited fees are identified, workers will be reimbursed within 90 days.

B. Recruitment fees and financial practices

1. Ensure workers are not required to pay deposits, make compulsory savings, or take on financial obligations in order to obtain or retain employment.
2. Ensure workers are not charged recruitment-related fees by either the employer or the labor brokerage (based on the RBA definition of what constitutes a fee).
3. Workers must maintain full control over their own bank accounts. Employers must not control or access workers' bank accounts (other than to help setup direct payroll deposits.
4. Restrictions on employee salary advances and loans:

   4.1 Personal loans cannot exceed 60% of one month's base wage (with a repayment period of no more than six months).
   4.2 Education loans cannot exceed 120% of one month's base wage (with a repayment period of no more than 12 months).
   4.3 Monthly repayments cannot exceed 10% of one month's base wage (and no interest can be charged.

C. Employment contracts

1. Workers are provided with a written employment contract in their native language or a language they understand before employment begins.
2. Foreign workers must receive and sign their employment contract before leaving their country of origin.
3. On arriving in Taiwan, the original employment contract must not be replaced or modified (unless the revised terms are more favorable to the worker than those in the original contract or in accordance with the law).
4. Key provisions in the contract must be explained verbally in the worker's native language, and the worker's understanding confirmed.
5. Employment contracts should specify work time as not exceeding 60 hours per week; overtime pay as at least 125% of the regular wage and detail any wage deductions.
6. Contract termination provisions

6.1 The resignation notice period cannot exceed one month.
6.2 The penalty for failing to provide the required notice cannot exceed 60% of one month's basic wage.
6.3 The contract cannot contain provisions prohibiting resignation.

D. Retention of identity documents and employment records

1. Workers must retain their own identity card, passport and work permit.
2. Workers should be provided with a secure space (such as a locker in a dormitory) to keep their personal documents.
3. Employers may retain the personal documents of workers only where required by law and with the worker's consent, but workers must still have access to them at any time.
4. All personnel files and employment resignation records must be retained for a minimum of 12 months.

E. Freedom of movement

1. Workers must be free to leave the workplace/dormitories when not working (without any unreasonable curfews).
2. Workers must have unrestricted access to toilets, drinking water and medical facilities.
3. Overtime work must be voluntary and workers have the right to decline.
4. Foreign workers must be permitted to return to their home country during annual leave or in an emergency without incurring any penalties.

F. Critical failing checklist (If the answer to any of the questions below is "Yes" that constitutes a critical failing)

1. Are workers prevented from terminating their employment?
2. Is the fine for resigning more than three months of basic wages?
3. Are the exits to the factory or dormitory locked, preventing emergency evacuation?
4. Are threats (such as deportation or reporting workers to the authorities) used to limit workers' freedom of movement?
5. Are workers forced to work against their will?
6. Have employment contract terms been changed to conditions that are less favorable than those in the original agreement?
7. Are workers' original identity documents withheld, destroyed, or hidden?
8. When employers are legally permitted to retain identity documents, are workers denied access to them for more than 12 hours, or charged a fee?

Adapted from RBA VAP Standard V8.0.2 (2025).

2. SA8000 (Social Accountability International Standard) Audit Process and Forced Labor Prevention Criteria)

Unlike many other codes of conduct, the core of SA8000 is a "management system" that requires enterprises to implement social responsibility through a process of continual improvements. To ensure compliance and credibility, the strict certification has six stages:

- Stage 1: Self-assessment

Enterprises are required to complete a self-assessment questionnaire on the Social Fingerprint platform as part of a preliminary evaluation of the differences between its existing management system and SA8000.

- Stage 2: Approach a certification body

The enterprise is required to contact an SA8000-accredited third-party certification body (such as SGS, BSI, TÜV NORD, or Intertek Testing Services Taiwan Ltd. etc.) to officially initiate the certification process.

- Stage 3: Stage 1 review (readiness assessment)

The certification body conducts a preliminary document review to assess the enterprise's level of preparation and determine whether it is ready to proceed to a comprehensive review.

- Stage 4: Stage 2 review (comprehensive certification)

This is the principal on-site certification audit. It includes a detailed review of documents, workplace observations, interviews with management and employees, and examination of operational records. The duration of the review depends on the size and operational scope of the enterprise.

- Stage 5: Making improvement to identified failings

If any nonconformities (failings) are identified during the audit process, the enterprise is required to provide and implement appropriate effective improvement measures, within a fixed period. The certification body then verifies the effectiveness of the corrective actions made.

- Stage 6: Obtaining certification and follow-up maintenance

Once all stages are conforming, the enterprise receives SA8000 Certification. The certificate is valid for three years, during which time the company is required to accept regular supervision and review. Upon expiration of the certification period, the company must undergo recertification to maintain its certified status.

SA8000: 2014 establishes clear and auditable requirements on "Forced and Compulsory Labor." Based on the ILO "Forced Labour Convention, 1930 (No. 29)," the ILO Abolition of Forced Labour Convention, 1957 (No. 105)," and international human rights standards. SA8000 requires enterprises to avoid all forms of involuntary labor at every stage of employment, including recruitment, hiring, management and termination. The following summarizes the concrete requirements this standard makes of organizations and their supply chains.

SA8000: 2014 "Prohibition of Forced Labor" Requirements

1. The organization must not engage in or support the use of forced or compulsory labor, as defined by the International Labour Organization (ILO) Forced Labour Convention, 1930 (No. 29) (including prison labor); it must not retain workers' original identity documents or ask workers to pay a "deposit" when their employment starts.
2. Neither the organization nor anybody supplying labor to the organization shall withhold any portion of workers' wages, benefits, property, or personal documents as a way of compelling them to continue working.
3. The organization is required to ensure workers are not required to bear, in whole or in part, any employment-related fees or costs.

4. On completion of a standard working day, workers have the right to leave the workplace and are free to terminate their employment relationship, providing the organization is given reasonable notice.
5. Neither the organization nor anybody supplying labor to the organization shall engage in or support human trafficking.

Adapted from Social Accountability 8000 International Standard (Social Accountability International, 2014).

3. SMETA audit processes

SMETA (Sedex Members Ethical Trade Audit) is a widely used global socially responsible audit method developed by non-profit membership organizations and Sedex, an online platform. It primarily assists enterprises share and access supply chain audit information, thereby reducing the need for duplicate audits. As a result, companies can select different audit models based on their needs. The "2-Pillar Audit" covers labor standards and health & safety; while the "4-Pillar Audit," includes the two basic pillars plus environment and business ethics. In addition, the main basis for an audit is the Ethical Trading Initiative Base Code (ETI base code), which is derived from related International Labour Organization (ILO) conventions and widely recognized by the international community. The SMETA audit process mainly consists of the stages detailed below:

Stage 1: Audit request & preparation

An enterprise or buyer/supplier (or other stakeholder) submits an audit request: Sedex provides a list of approved Affiliate Audit Companies (AACs) and the company can select a suitable audit firm based on its own needs (such as audit experience, local expertise, industry specialty etc.) After accepting the case, the audit firm makes the necessary audit arrangements and provides the company with a "Pre-Audit Information Pack" a minimum of two weeks before the audit is conducted. This pack includes the audit schedule, a list of required documents, worker language arrangements, as well as rules on photography and confidentiality. Before the audit, the enterprise is required to complete and share a Self-Assessment Questionnaire (SAQ) so auditors can better prepare their audit work.

Stage 2: On-site audit execution

During an on-site audit, auditors conduct an audit that includes: A site tour, document review, management interviews and worker interviews. When the enterprise has selected the 4-Pillar Audit model, the assessment also covers environmental management and business ethics.

Stage 3: Closing meeting and reporting writing

At the conclusion of the on-site audit, the auditors hold a closing meeting where they present the main findings of their work, including identified nonconforming items and examples of good practices, while also discussing potential areas for improvement with the enterprise that commissioned the audit. Following the audit, the auditors write a SMETA Audit Report, documenting all findings and

supporting evidence. At the same time, a Corrective Action Plan Report (CAPR) is drafted, outlining recommended corrective actions.

Stage 4: Uploading and sharing the report
After the auditors complete their report, the auditing firm uploads the Audit Report (together with the CAPR) to the Sedex platform, to be accessed by the buyer, customer or authorized supply chain partners. This "shared audit report" model is designed to reduce duplicate audits by allowing suppliers to the audited company to share a single audit report with multiple potential customers, thereby avoiding the additional time and cost of repeat audits.

Stage 5: Follow-up and periodic/subsequent audits
Where nonconformities or necessary adjustments are identified as part of the audit, the supplier is expected to implement corrective actions in accordance with the CAPR. Thereafter, the auditing firm can conduct either a desktop review or a follow-up on-site audit. In addition, regular reassessments can be arranged based on the needs of the supply chain, to ensure suppliers continue to comply with SMETA and ethical trade standards.

4. Fair labor accreditation process (FLA)

The FLA accreditation process is designed to assess an enterprise's human rights and responsible procurement governance systems, determining its ability to implement, monitor, and sustain FLA standards and remediation mechanisms within a global supply chain. The process is based on the FLA Workplace Code of Conduct and the FLA Principles of Fair Labor and Responsible Sourcing. The accreditation process is designed as a multi-year, milestone-based approval program. The first four milestones focus on "obtaining accreditation," while the fifth emphasizes "post-accreditation maintenance and continued improvement." The focus of the different stages is as follows:

- **Stage 1: Establishment of a basic system and document review**

Enterprises first need to become an FLA Participating Company and submit documentation on the basic framework of their human rights due diligence work. This includes workplace standards and policies, supplier code of conduct, responsible departments and governance structures, risk identification and priorities, and monitoring and remediation procedures. The FLA reviews how enterprises use these mechanisms to improve their governance systems and plant management, with written reviews providing written feedback and improvement recommendations.

- **Stage 2: Supply chain implementation and internal monitoring**

The focus of the assessment then shifts to practical implementation, including such practical evidence as supplier contracts and requirements, training records, internal or commissioned audit reports; and the tracking of remediation actions

and improvements. In this stage, the FLA also examines examples of the company's factory monitoring and remediation to determine whether the firm utilizes its existing management systems to manage various operational risks, rather than merely having related procedures only on-paper.

- **Stage 3: Launching Independent External Assessments (IEAs)**

The FLA appoints approved independent assessment teams to conduct IEAs at a sample plant in the enterprise's supply chain. Auditing methods include unannounced or short-notice on-site visits, document reviews, confidential interviews with management and workers, workplace planning and safety inspections, and remediation tracking of failings identified in the previous assessment. The FLA cross references these on-site observations with the enterprise's own audit and remediation information, to evaluate the reliability of its internal systems. The principal types of IEAs include:

I. Sustainable Compliance Initiative (SCI) Assessment: This simultaneously evaluates the company's headquarter governance, internal monitoring systems, plant practices and remediation mechanisms. It provides a comprehensive diagnostic of the "overall human rights due diligence system" and examines whether the enterprise and supply chain have the ability to "maintain long-term" observance of FLA standards and continue to make improvements.

II. SCI Baseline Assessment: Based on the SCI Assessment, the SCI Baseline Assessment takes the enterprise's policies, systems and practices and compares them to the FLA's principles and standards, to provide a more quantifiable and graded benchmark analysis.

III. Audit Field Observation: This "observes the auditing process conducted by the enterprise itself or/a commissioned party. FLA external assessors visit the workplace to observe the brand company or third-party auditors conduct a social responsibility audit. In this stage, FLA assessors record the design of the audit and whether it is implemented in accordance with FLA requirements relating to independence, the quality of worker interviews, sampling methods and evidence collection. This is intended to verify the reliability and credibility of the enterprise's own monitoring system.

- **Stage 4: Comprehensive assessment report and board voted on accreditation**

The FLA consolidates the system review of the above milestones into a comprehensive "Accreditation Assessment Report," which explains in detail the enterprise's performance in terms of protecting labor rights in the supply chain. The report is submitted to the FLA Board of Directors for discussion, which then votes on whether to grant Fair Labor Accreditation. Companies that pass can publicly declare they have obtained FLA Accreditation and use the FLA Accreditation mark in their communications, investment and branding marketing

materials.

- **Stage 5: Continue to receive annual assessments**

Following accreditation, the FLA conducts annual Post-Accreditation Reports, which systematically evaluate different FLA principles over a three-year period, to ensure the enterprise continues to make improvements in such key areas as work hours, wages, freedom of association and grievance mechanisms. At the same time, the FLA maintains a third-party complaints channels through which workers, trade unions, and non-governmental organizations (NGOs) can submit complaints directly to the FLA. The handling of these complaints is also incorporated into the follow-up assessment as to whether the company meets the requirements needed to maintain its accreditation.

The codes of conduct and audit standards developed by organizations such as the RBA and SA8000 are adopted by many enterprises. These mechanisms generally have rigorous audit procedures, relatively long certification periods and involve comparatively higher levels of investment in terms of time, resources and cost. Enterprises that do not consider external auditing, but want to obtain certification can consider the Social & Labor Convergence Program (SLCP). As part of this framework, a firm first completes a Self-Assessment, which is then "verified" by a third-party verification body, to confirm the authenticity and accuracy of the information provided. The primary objective of the SLCP is to establish a database that promotes information sharing, reducing repeat assessments in the supply chain and auditing costs. As such, the SLCP does not use a traditional scoring system to indicate whether an enterprise "passed" or "failed," nor does it issue certification. Once verification has been completed, the assessment results are uploaded to an SLCP-approved platform and, after receiving the company's authorization, shared with related users (other firms). In functional terms, the SLCP is essentially an information disclosure tool that enables enterprises to build their own "Corporate Social Responsibility Resume."

In summary, when an enterprise chooses to use RBA, SA8000, SMETA, FLA, or SLCP, it should consider its role in the supply chain, the expectations of key stakeholders, and whether third-party certification is required. What needs to be emphasized is that regardless of which audit, or method of informational verification is adopted, the core objective should not be merely to "demonstrate there is no forced labor," but rather that enterprises have already established management systems that are able to prevent, identify and deal with forced labor risks, with the ability to implement related measures and continue to make improvements.

Where an enterprise requires a third-party audit, it can seek the assistance of a professional consulting firm. Such advisors analyze the latest forced labor related

regulations (including specific requirements relating to customs import restrictions, inspection regimes, and “supply chain due diligence requirements in different countries) based on a company’s export markets (for example exports to the US or the European Union), to ensure compliance with the latest related regulations, while reducing the risk of supply chain disruption or sanctions imposed by importing countries.

6. Related domestic laws and regulations

The prohibition of forced labor is more than a moral principle for the international community, as violations can result in international trade sanctions or condemnation that adversely impact an enterprise's export business. In addition, Taiwan's domestic laws also contain various provisions on forced labor and companies that violate those laws may be subject to criminal penalties or administrative fines. For example, Paragraph 1, Article 5 of the "Employment Service Act" prohibits employment discrimination based on nationality, ethnicity etc. to ensure equal employment opportunities. Violations can be subject to an administrative fine ranging from NT$300,000 to NT$1.5 million. This provision corresponds to Forced Labour Indicator 1 – "Abuse of vulnerability." In the same way, Paragraph 2, Article 31 of the "Human Trafficking Prevention Act" notes that "Anyone using such means as debt bondage to subject him/her to labor to which the pay is not commensurate with the work duty or committing acts that are criminally punishable under the laws of the Republic of China, shall be sentenced to imprisonment for not more than three years; and, in addition thereto, a fine of not more than NT$1 million" may be imposed. This corresponds to Forced Labour Indicator 9 – "Debt bondage."

By helping enterprises better understand how to stop forced labor while familiarizing them with related domestic laws, the Guidelines enable companies to examine their legal compliance when assessing forced labor risks and reduce the likelihood of legal violations. More information on Taiwanese laws and the 11 forced labor indicators is provided below:

Indicator 1: “Abuse of vulnerability” related laws and regulations

The “abuse of vulnerability” indicator observes whether an employer exploits a worker's personal characteristics (such as the language barrier, physical or mental disabilities, or immigration status) or social circumstances (such as a lack of familiarity with the law or economic dependence), to impose unfavorable working conditions the worker would not otherwise accept. To address such issues, Taiwan’s “Employment Service Act” and “Immigration Act” clearly prohibit employment discrimination based on race, language and other reasons. In addition, the “Human Trafficking Prevention Act” and “Labor Standards Act” strictly prohibit the imposition of forced labor by exploiting a person's vulnerabilities or using violence, coercion, or intimidation. A summary of relevant legal provisions is provided below:

No.	Assessment items	Related domestic regulations	
		Law name	Article
1-1	Job assignments are based on objective standards such as skills and professional qualifications, with no differential treatment based on personal characteristics such as ethnicity, nationality etc.	Employment Service Act	Paragraph 1, Article 5 (Ensuring equality of employment opportunity)
		Immigration Act	Paragraph 1, Article 62 (Anti-discrimination provisions)
1-2	There is no harassment, bullying or discrimination in the workplace. Managers do not exploit employees' vulnerabilities (language barrier, advanced age, poor physical or mental health, or pregnancy) to treat them inappropriately.	Human Trafficking Prevention Act	Paragraph 2, Article 31 (Provisions on forced labor provisions)
		Labor Standards Act	Article 5 (Prohibition of forced labor)
		Employment Service Act	Paragraph 1, Article 5 (Ensuring equality of employment opportunity)
		Immigration Act	Paragraph 1, Article 62 (anti-discrimination provisions)
1-3	Workers are free to choose their own accommodation and meals and not subject to restrictions or mandatory arrangements made by the company, employer, or labor brokerage.	Criminal Code	Article 302 (Offenses against personal liberty)
		Criminal Code	Article 304 (Offense of coercion)
		Regulations on the Permission and Administration of the Employment of Foreign Workers by Employers	Paragraph 1, Article 33 (Regulations relating to the Living Care Service Plan)
1-4	Workers retain their original identification documents and independently undertake	Human Trafficking Prevention Act	Paragraph 2, Article 31 (Provisions on forced labor)
		Labor Standards Act	Article 5 (Prohibition of

	administrative procedures required to maintain their legal status		forced labor)
		Employment Service Act	Article 57 (Restrictions on employer conduct)
1-5	Recruitment and remuneration policies are fair, and workers are not treated differently because of their special life circumstances (being displaced by conflict or impacted by a natural disaster).	Human Trafficking Prevention Act	Paragraph 2, Article 31 (Provisions on forced labor)

Indicator 2: “Deception” related laws and regulations

The “deception” indicator primarily observes whether “actual working conditions” are consistent with “oral or written promises” made during the recruitment process, leading to workers unknowingly or mistakenly entering into an exploitative situation from which they are unable to extricate themselves. To address such issues, the “Employment Service Act” prohibits the use of false recruitment advertisements or the concealing of important information. The “Labor Standards Act” and the “Human Trafficking Prevention Act” also stipulate employers must not use bogus contracts or deceive workers into undertaking jobs where the compensation is clearly disproportionate to the work performed. A summary of relevant legal provisions is provided in the table below.

No.	Assessment items	Related domestic regulations	
		Law name	Article
2-1	Actual working conditions (including wages, work location, accommodation) are consistent with commitments made during the recruitment process.	Human Trafficking Prevention Act	Article 30 (Forcing others to perform labor)
		Human Trafficking Prevention Act	Article 31 (Forcing others to undertake jobs when the compensation is clearly disproportionate to the work performed)
		Labor Standards Act	Paragraph 1, Article 14 (Employers must not use bogus contracts)
		Labor Standards Act	Paragraph 2, Article 22 (wages must be paid directly and in full)
2-2	When workers arrive at the place of work, information on local living conditions and workers' rights should be provided in their native language or another easily understood language.	Regulations on the Permission and Administration of the Employment of Foreign Workers by Employers	Paragraph 1, Article 33 (Provisions relating to the Foreign Workers Living Care Service Plan)
2-3	Information should be transparent throughout the recruitment process, so workers accept a job on the basis of full knowledge and free choice.	Employment Service Act	Subparagraph 1, Paragraph 2, Article 5 (Provisions on false recruitment advertising)
		Employment Service Act	Paragraph 1, Article 40 (Prohibitions on the actions of private employment services agencies and their personnel)
		Employment Service Act	Paragraph 1, Article 54 (Prohibitions on the actions of employers)

Indicator 3: "Restriction of Movement" related laws and regulations

The "restriction of movement" indicator primarily observes whether employers unreasonably deprive workers of their freedom of movement in the workplace or dormitories by locking doors, installing fences, imposing strict curfews, or introducing mandatory transportation arrangements. In Taiwan, personal freedom is protected by several laws. For example, the "Criminal Code" details criminal liability for offenses involving unlawful deprivation of liberty and coercion and the "Human Trafficking Prevention Act" for acts committed with the intent to exploit others. The "Labor Standards Act" and the "Employment Service Act" also prohibit employers from forcibly detaining workers or restricting their autonomy in daily life. A summary of relevant legal provisions is provided in the table below.

No.	Assessment items	Related domestic regulations	
		Law name	Article
3-1	Workers are able to freely enter and leave the workplace.	Criminal Code	Article 302 (Offenses against personal liberty)
		Criminal Code	Article 304 (Offense of coercion)
		Human Trafficking Prevention Act	Article 30 (Forcing others to perform labor)
		Human Trafficking Prevention Act	Article 31 (Forcing others to undertake jobs when the compensation is clearly disproportionate to the work performed)
		Labor Standards Act	Article 5 (Prohibition of forced labor)
		Employment Service Act	Article 57 (Restrictions on employer conduct)
3-2	No measures are adopted in workplaces or dormitories to constrain the movements of workers, such as locked doors, fences or security personnel.	Criminal Code	Article 302 (Offenses against personal liberty)
		Criminal Code	Article 304 (Offense of coercion)
		Human Trafficking Prevention Act	Article 30 (Forcing others to perform labor)
		Human Trafficking Prevention Act	Article 31 (Forcing others to undertake jobs when the compensation is clearly disproportionate to the work performed)
		Labor Standards Act	Article 5 (Prohibition of forced labor)
		Employment Service Act	Article 57 (Restrictions on employer conduct)
3-3	Surveillance equipment is used only for legitimate	Criminal Code	Article 315 (Offenses against privacy)

	security purposes and not with the intent to restrict the movements of workers.		Article 315-1 (Offenses against privacy)
		Human Trafficking Prevention Act	Article 33 (Trafficking with intent to exploit)
		Personal Data Protection Act	Article 5 (The collection of personal data shall not exceed the scope of a specific purpose)
		Communication Security and Surveillance Act	Article 24 (Unlawful monitoring of others' communications)
		Regulations on the Permission and Administration of the Employment of Foreign Workers by Employers	Paragraph 1, Article 33 (Provisions relating to the Foreign Workers Living Care Service Plan)
3-4	Workers are free to choose their own means of transport and vehicles provided by the company are just one option. Workers are not forced to take certain vehicles and not accompanied or monitored when traveling.	Criminal Code	Article 302 (Offenses against personal liberty)
		Human Trafficking Prevention Act	Article 33 (Trafficking with intent to exploit)
		Labor Standards Act	Article 71 (effectiveness of work-related rules)
		Employment Service Act	Paragraph 1, Article 40 (Prohibitions on the actions of private employment services agencies and their personnel)
3-5	Workers are free to choose their own place of residence and not required to live in dormitories designated by employers or labor brokerages.	Criminal Code	Article 302 (Offenses against personal liberty)
		Human Trafficking Prevention Act	Article 33 (Trafficking with intent to exploit)
		Labor Standards Act	Article 71 (effectiveness of work-related rules)
		Employment Service Act	Paragraph 1, Article 40 (Prohibitions on the actions of private employment services agencies and their personnel)
		Regulations on the Permission and Administration of the Employment of Foreign Workers by Employers	Paragraph 5, Article 34 (Reporting requirements for accommodation locations not arranged by employers)

Indicator 4: "Isolation" related laws and regulations

The "isolation" indicator primarily observes whether workers are placed in remote environments or unable to freely communicate with the outside world (through the confiscation of cellphones or by not providing internet access), leaving them isolated, unassisted and more susceptible to employer control. To address this issue, laws and regulations in Taiwan require employers to provide foreign workers with appropriate life care and channels of communication (examples include the Regulations on the Permission and Administration of the Employment of Foreign Workers by Employers). In addition, the Criminal Code imposes penalties for acts that interfere with the communications or personal freedom of others. A summary of relevant legal provisions is provided in the table below.

No.	Assessment items	Related domestic regulations	
		Law name	Article
4-1	Measures have been taken to reduce the inconvenience faced by workers who work in a remote area or factory	Regulations on the Permission and Administration of the Employment of Foreign Workers by Employers	Paragraph 1, Article 33 (Regulations relating to the Living Care Service Plan)
4-2	Workers are free to communicate with family members, social groups or NGOs. as long doing so does not interfere with their work.	Criminal Code	Article 315 (Offenses against privacy)
4-3	The personal communication devices of workers are not confiscated or kept by a third party.	Criminal Code	Article 304 (Offense of coercion)
		Employment Service Act	Subparagraph 8, Article 57 (Restrictions on employer conduct)
4-4	The social life of workers is respected, and no policies or rules are imposed to restrict such activities.	Criminal Code	Article 302 (Offenses against personal liberty)
		Criminal Code	Article 304 (Offense of coercion)
4-5	Language or cultural adaptation measures are provided to help foreign workers be part of the local community.	Regulations on the Permission and Administration of the Employment of Foreign Workers by Employers	Paragraph 1, Article 33 (Regulations relating to the Living Care Service Plan)
4-7	All business premises are legally registered, allowing law enforcement or third-party organizations to locate the premises and determine the circumstances of workers at any time.	Company Act	Article 19 (Restrictions on operating without registration)
		Business Registration Act	Article 9 (Business registration regulations)
		Factory Management and Counseling Act	Article 10 (Registration and establishment permit regulations)

		Employment Service Act	Article 62 (Agencies with the authority to conduct inspections)
		Factory Management and Counseling Act	Article 10 (Registration and establishment permit regulations)
		Occupational Safety and Health Act	Article 36 (Inspections by competent authorities and labor inspection agencies)

Indicator 5: "Physical and sexual violence" related laws and regulations

The "physical and sexual violence" indicator primarily observes whether abusive behavior such as physical assault, sexual harassment, or being forced to take drugs is used in the workplace as a way of punishing or controlling workers. To address these issues in Taiwan, the "Criminal Code" imposes penalties for offenses involving bodily injury, intimidation and coercion; The "Labor Standards Act" clearly prohibits employers from using violence against workers; In addition, the "Occupational Safety and Health Act" and the "Gender Equality in Employment Act" require enterprises to establish mechanisms for the prevention of workplace violence and sexual harassment, as well as procedures for handling related complaints. A summary of relevant legal provisions is provided in the table below:

No.	Assessment items	Related domestic regulations	
		Law name	Article
5-1	Preventive mechanisms are in place to prevent managers from abusing their authority through coercion or violence	Criminal Code	Article 277 (Offense of causing bodily injury)
		Criminal Code	Article 305 (Offense of intimidation)
		Labor Standards Act	Article 5 (Prohibition of forced labor)
		Labor Standards Act	Paragraph 1, Article 14 (Employers shall not commit acts of violence or seriously insult workers)
		Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the performance of work duties)
5-2	Workers are not controlled through the use of drugs or alcohol.	Criminal Code	Article 304 (Offense of coercion)
		Criminal Code	Article 305 (Offense of intimidation)
		Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the performance of work duties)
5-3	A policy of "zero-tolerance" on workplace violence and harassment has been effectively incorporated into training and day-to-day management	Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the performance of work duties)
		Gender Equality in Employment Act	Article 13 (Prevention of sexual harassment)
5-4	Workers who experience workplace violence or harassment can file complaints in their native language or another language with which they are familiar.	Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the performance of work duties)
		Gender Equality in Employment Act	Article 13 (Prevention of sexual harassment, complaint

	The complaint procedures are clear and confidential.		channels, complaint investigation procedures, and confidentiality standards)
5-5	Disciplinary measures are fair, proportionate and do not involve violence.	Criminal Code	Article 277 (Offense of causing bodily injury)
		Criminal Code	Article 305 (Offense of intimidation)
		Labor Standards Act	Article 71 (effectiveness of work-related rules)
		Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the performance of work duties)

Indicator 6: “Threats and intimidation” related laws and regulations

The “threats and intimidation” indicator primarily observes whether employers use psychological coercion (for example by threatening deportation, dismissal, reporting workers for illegal immigration status, or threatening to harm their family members) to force workers into compliance or silence. To address this form of psychological violence, the “Criminal Code” details the crime of intimidation. The “Employment Service Act” prohibits employers from coercing foreign nationals into forced labor. In addition, both the “Labor Standards Act” and the “Occupational Safety and Health Act” protect workers from undue physical or psychological harm. A summary of relevant legal provisions is provided in the table below:

No.	Assessment items	Related domestic regulations	
		Law name	Article
6-1	Managers do not engage in any form of intimidation, threats, or verbal abuse toward workers.	Criminal Code	Article 305 (Offense of intimidation)
		Labor Standards Act	Article 5 (Prohibition of forced labor)
		Employment Service Act	Subparagraph 7, Article 57 (Coercing foreign workers to engage in forced labor)
		Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the performance of work duties)
6-2	The disciplinary system does not include coercive measures such as withholding wages or reducing workers' living standards.	Criminal Code	Article 304 (Offense of coercion)
		Labor Standards Act	Paragraph 2, Article 22 (wages must be paid directly and in full)
		Labor Standards Act	Article 26 (Prohibition of wage withholding)
		Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the performance of work duties)
6-3	Managers or labor brokerages do not coerce workers into obeying by threatening to harm their family, friends or relatives.	Criminal Code	Article 305 (Offense of intimidation)
		Employment Service Act	Subparagraph 7, Article 57 (Coercing foreign workers to engage in forced labor)
		Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the performance of work duties)
6-4	Managers or labor brokerages do not use intimidation or coercion to prevent workers	Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the

	from seeking to terminate their employment.		performance of work duties)
6-5	Workers have access to multiple complaint channels with clear complaint rules and procedures, and a high degree of confidentiality, allowing them to file complaints without fear of exposure, intimidation, threats, or any form of retaliation.	Occupational Safety and Health Act	Paragraph 2, Article 6 (Prevention of illegal physical or mental infringement in the
		Labor Standards Act	Article 74 (Employers shall not take adverse actions against employees)

Indicator 7: “Withholding identity documents” related laws and regulations

The “withholding identity documents” indicator primarily observes whether employers or labor brokerages confiscate the passports, residence permits, or other identity documents of workers, thereby preventing them from moving freely, transferring jobs, or seeking administrative assistance. Article 57 of the “Employment Service Act” clearly prohibits employers from illegally withholding or misappropriating the passports, residence documents, or personal property of foreign nationals, ensuring workers retain full control over their personal documents. A summary of relevant legal provisions is provided in the table below:

No.	Assessment items	Related domestic regulations	
		Law name	Article
7-1	The enterprise does not retain workers' ARC, passports, or travel documents for any reason.	Employment Service Act	Subparagraph 8, Article 57 (Restrictions on employer conduct)
7-2	Where workers voluntarily agree to have their documents held by the enterprise a return period should be specified, and workers retain the unconditional right to retrieve their documents at any time.	Employment Service Act	Subparagraph 8, Article 57 (Restrictions on employer conduct)

Indicator 8: "Wage withholding" related laws and regulations

The "wage withholding" indicator primarily observes whether employers use the delayed payment of wages, illegal deductions, forced savings or false fines as a tool to ensure workers do not resign. To ensure wage protections, the "Labor Standards Act" establishes strict rules, including the requirement for employers to pay wages in full and directly to workers, prohibits advance deductions from wages as a contract violation penalty or compensation, and requires employers maintain wage records that workers have a right to review. A summary of relevant legal provisions is provided in the table below:

No.	Assessment items	Related domestic regulations	
		Law name	Article
8-1	Employment contracts clearly specify how wages are calculated and method of payment in a language understood by the worker.	Enforcement Rules of the Labor Standards Act	Subparagraph 3, Article 7 (Items to be included in a labor contract)
8-2	Wages are paid in full and on time on a designated payday.	Labor Standards Act	Paragraph 2, Article 22 (Principle on the full payment of wages)
		Labor Standards Act	Paragraph 1, Article 23 (Principle on the regular payment of wages)
8-3	Workers receive a detailed pay slip (including all payments and deductions) in a language they understand every payday.	Labor Standards Act	Paragraph 1, Article 23 (Principle on the regular payment of wages)
		Enforcement Rules of the Labor Standards Act	Article 14-1 (Itemized payroll)
8-4	Wages are directly paid into a bank account opened and controlled by the worker.	Labor Standards Act	Paragraph 2, Article 22 (Principle on the full payment of wages)
8-5	No deductions are made from wages as deposits, penalties, security payments, or compensation.	Labor Standards Act	Article 26 (Prohibition on the withholding of wages)
8-6	All lawful deductions (such as board and lodging) are specified in the employment contract in a language understood by the worker and itemized on the pay slip.	Labor Standards Act	Paragraph 2, Article 22 (Principle on the full payment of wages)
		Labor Standards Act	Paragraph 1, Article 23 (Principle on the regular payment of wages)
		Enforcement Rules of the Labor Standards Act	Article 14-1 (Itemized payroll)
8-7	A verification mechanism is in place for dispatched workers (including outreach	Labor Standards Act	Article 22-1 (Payment of wages for dispatched workers)

	foreign workers) to ensure their wages are paid in full.		
8-8	Can workers access attendance records, overtime records, and other documents used to calculate wages at any time?	Labor Standards Act	Paragraph 6, Article 30 (Right to access employee attendance records)

Indicator 9: “Debt bondage” related laws and regulations

The “debt bondage” indicator primarily observes whether workers are burdened with debt as a result of excessive recruitment fees, salary advances or loans, and therefore compelled to repay those debts through the provision of labor, trapping them in a cycle from which they are unable to terminate their employment. To address this issue, in Taiwan the “Criminal Code” details the crime of enslavement, while the “Human Trafficking Prevention Act” strictly prohibits compelling individuals to perform labor to repay debts. In addition, the “Labor Standards Act” prohibits the withholding of wages. A summary of relevant legal provisions is provided in the table below:

No.	Assessment items	Related domestic regulations	
		Law name	Article
9-1	Workers are not required to repay wage advances or loans through the provision of labor.	Criminal Code	Article 296 (crime of enslavement)
		Human Trafficking Prevention Act	Paragraph 2, Article 31 (Forced labor provisions)
		Labor Standards Act	Paragraph 2, Article 22 (wages must be paid directly and in full)
		Labor Standards Act	Article 26 (Prohibition on the withholding of wages)

Indicator 10: "Abusive working and living conditions" related laws and regulations

The "abusive working and living conditions" indicator primarily observes whether workers are forced to work or live in environments that are unsanitary, dangerous, overcrowded, lacking in privacy, or otherwise incompatible with human dignity. To address these issues, the "Occupational Safety and Health Act" and "Labor Standards Act" requires employers to provide a safe and hygienic environment and implement appropriate measures. In addition, the "Regulations on the Permission and Administration of the Employment of Foreign Workers" set out specific standards for safety and basic living facilities that must be provided in foreign worker dormitories. A summary of relevant legal provisions is provided in the table below:

No.	Assessment items	Related domestic regulations	
		Law name	Article
10-2	Workers operating dangerous machinery have received appropriate training and hold the required certification.	Occupational Safety and Health Act	Article 32 (Employers are required to provide workers with all necessary health and safety training)
		Occupational Safety and Health Education and Training Regulations	Articles 12-14 (Employers are required to provide workers who operate dangerous machinery with all necessary training)
10-3	Workers are provided with necessary personal protective equipment (PPE), which is regularly replaced.	Labor Standards Act	Article 8 (Employers have a duty to provide a safe working environment)
		Occupational Safety and Health Act	Article 6 (Employers are required to provide necessary health and safety equipment and measures)
		Regulations on the Occupational Safety and Health Equipment	Article 277 (Regulations on the management of personal protective equipment)
10-4	Working and living conditions meet the need for human dignity are not crowded, unsanitary or lack privacy.	Labor Standards Act	Article 1 (Basic responsibilities of employers)
		Occupational Safety and Health Act	Article 1 (Basic responsibilities of employers)
10-5	Dormitories provide clean water, adequate sanitation facilities and are located away from flammable, explosive, hazardous materials and other dangerous areas, including those where there is	Regulations on the Permission and Administration of the Employment of Foreign Workers	Paragraph 1, Article 33 (Regulations relating to the Living Care Service Plan)

	excessive vibrations or noise.		
10-6	Workers are free to choose where they live and not forced to reside in designated accommodation.	Regulations on the Permission and Administration of the Employment of Foreign Workers	Paragraph 5, Article 34 (Reporting requirements for accommodation locations not arranged by employers)
10-7	Workers have channels to complain about their working and living conditions.	Labor Standards Act	Article 83 (Holding of labor-management meetings)
		Regulations on the Permission and Administration of the Employment of Foreign Workers	Paragraph 1, Article 33 (Regulations relating to the Living Care Service Plan)

Indicator 11: "Excessive overtime" related laws and regulations

The "excessive overtime" indicator primarily observes whether workers are forced to work overtime against their will or routinely required to work beyond the statutory maximum working hours without adequate rest. To address this issue, the "Labor Standards Act" details clear limits on regular working hours and overtime hours, as well as minimum intervals between shifts, and statutory days off. It also requires that overtime work has to be approved by a labor union or labor-management meeting, and mandates employers are paid overtime. A summary of relevant legal provisions is provided in the table below:

No.	Assessment items	Related domestic regulations	
		Law name	Article
11-1	Workers receive statutory leave and reasonable rest breaks when working.	Labor Standards Act	Article 30 (Daily and weekly work hours)
		Labor Standards Act	Article 32 (Regulations on overtime work)
		Labor Standards Act	Article 34 (Regulations on shift work)
		Labor Standards Act	Article 35 (Regulations on continuous work and rest periods)
		Labor Standards Act	Article 36 (Regulations on one regular leave day and one rest day)
		Labor Standards Act	Article 37 (Regulations on national holidays)
		Labor Standards Act	Article 38 (Regulations on annual leave)
11-2	Workers have the right to refuse overtime. As such, any extension of work hours by an employer requires the consent of workers. Enterprises should also implement overtime review procedures and controls to ensure total work hours remain within legal limits and there is no excessive overtime.	Labor Standards Act	Article 32 (Regulations on overtime work)
		Labor Standards Act	Article 42 (Forced work outside normal work hours is prohibited)
11-3	All overtime worked by employees is paid in accordance with related laws or compensatory leave provided.	Labor Standards Act	Article 24 (Regulations on overtime pay for extended work time)
		Labor Standards Act	Article 32-1 (Regulations on compensatory leave after overtime)
		Labor Standards Act	Article 39 (Double pay for working on a statutory

			holiday)

7. Forced labor case studies

To help enterprises gain a deeper understanding of the real-world manifestations of forced labor and the possible consequences of such violations, the Guidelines present a compilation of related cases, categorizing them into the following nine forced labor scenarios. Each case is analyzed to determine which forced labor indicators are involved, while detailing the corresponding legal liability and business risks. This serves as a practical reference for enterprises to assess human rights risks within their own supply chains.

Case 1: Excessive work hours and control through violence in the aluminum product supply chain

Lee Ming (pseudonym) originally worked at a small factory in a landlocked country in Asia, earning a low income. To improve his family's living conditions, he accepted a job at an overseas aluminum products factory from a labor brokerage. However, on arrival, he found that the situation was completely different to what he had been told during the recruitment process. The factory was located in a remote industrial area, while the promised well-equipped facilities and accommodation was replaced by an old corrugated metal building.

Work began before dawn and continued until the machinery stopped late at night. In addition, the output targets set by managers were nearly impossible to meet within normal work hours. On top of that, any delay resulted in verbal abuse and even threats of dismissal. Lee Ming repeatedly witnessed coworkers being pushed to the ground and beaten for taking brief breaks. The sound of whispered reprimands and the clanging of metal became a daily backdrop to work in the factory.

However, the most unbearable aspect was the endless work hours. Senior managers frequently demanded workers work overtime under the pretext of “urgent orders,” requiring Lee to work more than 14 hours a day for extended periods. Aluminum shavings and the intense heat repeatedly burned his hands, and the stinging pain lingered through the night, making it difficult to sleep. In the dark and suffocating aluminum factory, Lee gradually realized that he was not simply in a place of work, but rather a cage without bars, one that existed in the name of “work” yet offered almost no way out for those employed there.

The labor conditions at the factory were later exposed by an international human rights organization, which attracted global attention. An investigation confirmed that related products involved forced labor risks and the United States took action. As such, the U.S. Customs and Border Protection (CBP), pursuant to relevant regulations, issued a Withhold Release Order (WRO) against products from the factory, preventing its aluminum products from entering the U.S. market.

Analysis of forced labor items

- **Excessive overtime**: Workers were required to work long hours and lacked any genuine ability to refuse overtime work.
- **Threats and intimidation**: Verbal abuse, threats of dismissal and wage deductions were used as methods of management and control.
- **Physical and Sexual Violence**: Workers who attempted to take breaks or failed to meet production output targets were subjected to physical violence, including pushing and beatings.

Consequences of involvement in forced labor

- **Forced labor enforcement measures at the U.S. border**: The CBP determined that the products involved forced labor risks and issued a Withhold Release Order (WRO) in accordance with related regulations. The order prohibited the importation of related aluminum products into the U.S., resulting in shipped products being seized, orders being canceled, and export channels being disrupted.

Case 2: Excessive work hours and contract penalty violations in the electronic products supply chain

The lights of the night shift remained on throughout the night, illuminating rows of production lines stretching into the distance and the sound of machinery operating was almost constant. This was a modern electronics manufacturing plant with advanced equipment and a steady flow of orders. It also served as an important supplier for many international brands. For management, the factory emphasized efficiency and on-time delivery. However, for A-chiang (pseudonym), that meant a work routine that involved working more than 12 hours a day.

When A-chiang arrived at the factory, he was told that as long as he cooperated with the shift schedule and worked hard, he would earn a steady income. It was only after he started working on the production line, that he discovered overtime was not an occasional requirement but rather viewed as a natural part of the job. Although officially overtime required the "consent" of employees, in practice workers who were resistant to working overtime risked unfavorable shift assignments, poor performance evaluations, or even the non-renewal of their contracts.

In addition to pressure associated with work hours, another intangible constraint came from the employment contract. Before starting work at the factory, A-chiang had borrowed a large sum of money from an unlicensed lender in his home country to pay the recruitment fees charged by a labor brokerage, which took him three years to repay. Moreover, on arriving A-chiang and other foreign workers were required to sign employment agreements containing substantial contract violation penalty clauses. The contracts stipulated that any worker who resigned before the agreed contract period, regardless of the reason, would be required to pay a penalty equivalent to several months of wages, in addition to repaying "training costs" or "related recruitment expenses." These provisions were not adequately explained at the time of signing. Only when some workers attempted to resign did they discover that the financial burden incurred by doing so was far beyond what they could afford.

The long hours and physically demanding nature of repetitive work soon took a toll on workers' health, with fatigue, dizziness, and insomnia common on the production line. Some workers who wanted to resign because of their worsening health changed their minds after learning how much they would have to pay. For many, continuing to work under difficult conditions made more sense than accepting the severe economic consequences of resigning.

Ultimately, this situation was exposed through an audit and independent investigation. The report revealed that the supplier had long relied on excessive overtime and high financial penalties to discourage workers from resigning, creating the risk of forced labor through economic coercion. Following the disclosure of these findings, related brands demanded that the supplier comprehensively review its work-time system and certain clauses in its

employment contracts, while also adopting follow-up improvements and monitoring mechanisms.

Analysis of forced labor items

- **Debt bondage**: Workers incurred loans during the recruitment process, leading to structural debt control that forced them to remain employed and continue working to repay their debt.
- **Excessive overtime**: Workers were required to work excessively long hours without the right to refuse overtime.

Consequences of involvement in forced labor

- **Impact on orders and cooperative relationships**:
  The supplier involved in the case was required to improve its labor system within a fixed period of time. Failure to do so could result in the suspension, reduction, or termination of customer orders, directly impacting the factory's operations and capacity allocation.
- **Increased brand and supply chain reputational risks**:
  Once the case became public, outsiders began to view the supply system as a high-risk supply chain. The enterprise was required to devote additional resources to improvements, third-party audits and public communications, in response to concerns raised by investors and the consumer market.
- **Forced adjustments to system and contract provisions**:
  Under the pressure of continued monitoring, the employer was required to revise its employment contracts by removing or reducing contract violation penalties and unreasonable fees. The company was also expected to review its work-time and overtime management practices to avoid future forced labor risks.

Case 3: Endless working hours and the no right to refuse overtime in the manufacturing industry

Le Van (pseudonym) left his hometown in northern Vietnam to work overseas, hoping to provide a more stable life for his family. To pay the labor brokerage fees, he mortgaged his family's only paddy field and borrowed money from a high-interest lender, based on the labor broker's promise of "a monthly salary of NT$35,000, free meals and accommodation, and easy work." That promise was the one hope he held onto as he set out on his journey.

After arriving at the factory, Le Van quickly realized that the work hours were much longer than he had expected. He started work at 7:00 a.m. every day and often had to work until 10:00 p.m. or even later. Although the company officially paid overtime in accordance with the law, and the figures on his pay slips appeared to comply with legal requirements, in reality workers were not given a choice about whether to work overtime.

Some foreign workers privately told him if they indicated they were unable to work overtime, the following day they could be assigned to the most demanding workstations or receive disciplinary marks in their performance evaluation. In more direct situations, workers had their allowances reduced or deductions were made from their wages on the grounds of being "insufficiently cooperative." Over time, everyone came to understand that although overtime was described as "voluntary," refusing it came with clear disciplinary and economic pressure. Le Van once tried to ask his supervisor why workers were punished for declining overtime. The supervisor responded hurriedly in a language Le Van could not fully understand, remembering just one remark: "Everyone is treated the same."

The language barrier and his vulnerable status as a foreign worker left Le Van with little ability to argue. He gradually came to realize that the problem was not whether overtime wages were paid or not, but that workers had no real freedom to refuse overtime. Although the right to choose existed in name, in reality it was strictly limited by a mechanism of penalties.

However, one day the atmosphere in the factory began to change. News spread among the workers that an international investigation had identified the factory as using "forced labor," including excessive fees charged by overseas labor brokerages, arbitrary wage deductions, and excessive overtime. Soon afterward, reports emerged that foreign forced labor enforcement measures had temporarily banned imports of goods produced by the factory. Within weeks, and facing mounting external pressure, the company announced the implementation of a "Zero Recruitment Fee" program. For Le Van, it felt like a long overdue glimmer of light.

Analysis of forced labor items

- **Debt bondage**: Workers were required to cover recruitment-related costs prior to employment, causing some to incur debt. After starting work, in order to avoid losing their income or jeopardizing their ability to repay these debts,

those workers are forced to accept excessive work hours and unfavorable working conditions.

- **Abuse of vulnerability**: Most of the workers were foreign workers with limited language skills, insufficient information on the labor market and residency status tied to their employer, which in the face of unfair working conditions and improper management, left them with little practical ability to refuse such conditions or seek effective assistance.
- **Withholding wages**: Although on the surface wages and overtime pay were paid in accordance with legal requirements, employers exerted economic pressure on workers who refused overtime or failed to comply with management arrangements by reducing allowances, imposing punitive wage deductions, or not issuing wages as metods of management and control.
- **Excessive overtime**: Over the long-term the employer required workers to work beyond normal work hours and treated overtime as a tacit obligation. Even when workers experienced significant physical and mental stress, they were still unable to refuse, creating a situation in which de facto forced overtime was the norm.

Consequences of involvement in forced labor

- **Seizure of goods by other countries**: Products manufactured by the company became subject to import restrictions or bans in overseas authorities, which had a tangible impact that caused significant disruptions to the enterprise’s operations.
- **Damage to business reputation**: International buyer supply chains reassessed their willingness to cooperate with manufacturers implicated in forced labor, which could ultimately lead to the termination of business relationships, creating difficulties for the manufacturer's operations.

Case 4: Harsh living conditions and unpaid wages behind the production line

A-cheng (pseudonym) is a foreign worker from Vietnam who went abroad to work on the production line at a manufacturing factory through a labor brokerage several years ago. The reason he decided to work overseas was simple: to have a stable job, receive a monthly salary, send money back to his family and gradually pay off the large recruitment fees and family loans he incurred before leaving.

The pace of work at the factory was very quick and A-cheng would start work at the production line during the day and often work until late at night. Even when the machines stopped, the workers were not allowed to leave. Overtime became a daily occurrence, but the numbers recorded on his pay slips were frequently different to the hours he calculated himself. Several times, A-cheng plucked up the courage to ask how overtime pay was calculated, only to receive vague responses or be told, "Do it first, we'll talk about it later." With debts to repay and his family waiting for remittances, A-cheng did not dare to keep asking. He could only continue to give away his time, a little at a time.

After work, A-cheng returned to the dormitory arranged by the company. It was not a proper residential building, but rather a metal-sheet warehouse located on an unused plot of land across from the factory. Originally used to store raw materials such as heat blocking film and foam, the space had been fitted with a mezzanine floor on the second level, where foreign workers lived. More than a dozen workers were crammed into an area of roughly 30 ping (about 99 square meters), with almost no windows. Inside, chipboard and cardboard were used to divide the area into tiny sleeping spaces, resembling makeshift prison cells. Clothes hung all over the stair railings, and the only way out was through a narrow staircase.

This was the worker's daily life. They spent the day exhausting themselves on the production line and returned at night to the sweltering, enclosed mezzanine to rest. No one explained the evacuation routes to them or told them that the materials piled beneath their feet were highly flammable. Although A-cheng realized this was not a safe environment in which to live and that in the event of a fire escaping would be almost impossible, as the key breadwinner for his family, he had no choice but to work as hard as possible and repay his debts as quickly as possible. Living there was simply "somewhere he had been assigned to live," there was no alternative.

Then, in the early hours of one morning, everything went crazy. Flames exploded from an electrical distribution box and wiring near the staircase, instantly igniting a pile of nearby clothing, plastic, cardboard and foam. Thick smoke and intense heat surged upward along the stairs, completely blocking the only escape route in minutes. The fire continued to spread and burned for eight hours, so by dawn, all that remained was the charred shell of the metal-sheet warehouse.

That night, six foreign workers died, while five others were seriously injured. The night before, they had all been worrying about whether their overtime pay would be deposited in their account and when they would be able to pay-off their debts.

In the end, they were trapped inside a mezzanine that should never have been used as living quarters.

Analysis of forced labor items

- **Debt bondage**: Before leaving their home country, foreign workers were required to pay high overseas labor brokerage fees. After starting work, they are forced to continue working to repay their debts, making it difficult for them to leave their jobs or seek assistance even when facing unfavorable work hours and dangerous living conditions.
- **Abuse of vulnerability**: The employer exploited the workers' background, debts they had to repay and urgent need for income. As a result, workers felt forced to tolerate unreasonable treatment just to keep their jobs and were reluctant to demand their rights.
- **Harsh working and living conditions**: Workers were required to engage in production-line work for long periods of time. After their shifts, they were collectively housed in a mezzanine area in a metal-sheet warehouse that was not a safe living space. The accommodation was overcrowded, poorly ventilated, and had only one emergency evacuation route, exposing workers long-term exposure to an environment that posed a serious threat to their safety.
- **Withholding wages**: The employer failed to pay overtime compensation based on the actual time worked. Even when workers noticed the calculations were wrong their status and financial pressure made it difficult for them to question the employer or refuse to accept the situation, resulting in a form of economic control.

Consequences of involvement in forced labor

- **Severe loss of life and serious injuries**: The fire continued to burn for about eight hours, resulting in the deaths of six foreign workers and serious injuries to five others. The incident was one of the most serious foreign worker dormitory fires in the local area.
- **Judicial and administrative actions**: The responsible person/managers were subject to judicial investigation for alleged violations related to building safety and professional negligence resulting in death. In addition, failure to pay the required overtime wages for extended working hours and provide compensation for deaths resulting from occupational accidents also resulted in administrative penalties.

Case 5: The labor contract deception in the "Century Stadium" construction project

Adi (pseudonym) first saw a contract to work overseas in a labor brokerage office in his hometown. The contract clearly stated the salary and the broker explained that the job involved warehouse management, construction logistics and required little prolonged outdoor work. Based on this information Adi believed he was about to begin a relatively stable and safe job abroad.

However, shortly after arriving in the host country, the situation quickly changed. Adi was taken to the construction site management office and told to sign a new employment contract. Under the new agreement, his salary was greatly reduced and what was originally described as logistics work now became physically demanding construction work. Managers informed him that this reflected the "actual job assignment" and that refusal to sign would be considered the same as declining the position, requiring him to leave the country at his own expense. Faced with this sudden change, Adi found there was virtually no room to negotiate.

In the days that followed, Adi worked long hours of physical labor in extreme heat, as carrying construction materials and tying rebar became part of his daily routine. At night, he shared a makeshift dormitory with more than a dozen other workers. The cramped and poorly ventilated accommodation offered little opportunity for quality rest. As the days passed and the "Century Stadium" project neared completion, the situation faced by workers was largely overlooked.

When international media outlets and human rights organizations exposed these conditions, the stadium construction project quickly became the focus of global attention and the international reputation of the host country suffered significant damage. Several teams announced they would wear symbolic protest jerseys during matches to express their dissatisfaction with both the international sports governing body responsible for organizing the tournament and the failure of the host country to adequately address dissatisfaction with the labor conditions faced by foreign workers. At the same time, as it became increasingly difficult to separate major sporting events from human rights concerns, spontaneous grassroots boycott campaigns were organized by fans and civil society groups around the world, urging the public to "refuse to watch the tournament" and "boycott event sponsors." These campaigns called on the international community to recognize that behind the spectacle of the competition lay a huge cost in terms of labor and human rights.

Under sustained international pressure, several contractors were investigated, while a number of multinational corporations terminated their partnerships or called for improvements to labor conditions. The host government was also compelled to announce amendments to certain aspects of its foreign worker system. Although related reforms were widely criticized as being too little, too late to remedy the harm already caused. This "contract deception" has since become an important case highlighting the human rights risks associated with large-scale international sporting events.

Analysis of forced labor items

- **Deception**: There was a significant difference between the wages and job duties promised during the recruitment process and the actual terms and conditions of employment.
- **Intimidation and threats**: Workers were told that refusing to sign the new contract would be considered the same as declining the position and would require them to leave the country at their own expense. This is a classic example of coercing workers to accept unfavorable employment conditions through threats of adverse consequences.
- **Abusive working and living conditions**: The workers' accommodation and living environment failed to meet basic safety and hygiene standards.

Consequences of involvement in forced labor

- **Contractors under investigation**: Faced with sustained international pressure, the contractors responsible for the construction project were investigated and faced potential legal and administrative liability for contract fraud and substandard labor conditions.
- **Severe damage to the country's international reputation**: After international media and human rights organizations exposed the exploitation of foreign workers, the failure of the host country to adequately deal with the issue of foreign worker's rights significantly damaging its international image. Rather than enhancing the country's global reputation by hosting the event, it suffered substantial reputational harm.
- **Reputational crisis for commercial brands and sponsors**: The linkage between human rights concerns and commercial interests led to global boycott campaigns led by civil society organizations and football fans, including calls to "stop watching the tournament" and "boycott event sponsors." As a result, several multinational corporations terminated their partnerships or demanded improvements, demonstrating that disregarding human rights risks within supply chains can cause substantive harm to brands.

Case 6: Restrictions on freedom of movement and wage exploitation in the logistics industry

Alexei (pseudonym) is from Eastern Europe where he saw a recruitment advertisement for a cross-border logistics position that promised stable pay, accommodation and meals, as well as opportunities to conduct transportation assignments across Europe. Hoping to improve the financial situation of his family, Alexei signed a contract and traveled abroad to start work. However, after starting the job, he quickly discovered that the actual working conditions were very different to what he had been led to expect.

His "accommodation" was an old truck and the narrow sleeping berth behind the driver's cabin became his long-term living space. More importantly, the company installed a GPS tracking system in its trucks and informed drivers that their routes, where they stopped and duration of stops would be monitored in real time. Managers claimed GPS was used as "a tool to improve operational efficiency."

Alexei drove for 10-12 hours every day, far exceeding the workload detailed in the original agreement. Even on weekends or after extended periods of driving, he was not allowed to stop at a hotel to rest. On one occasion, a driver was penalized for taking a truck to a hotel to shower. The company deducted an entire week's wages, claiming the driver had "deviated from the assigned route without permission." After that incident, the drivers no longer dared to stop when thy wanted. The GPS signals became an invisible restraint, with the system effectively functioning as a means of controlling freedom of movement.

The wage situation was equally shocking. During the first month, the amount deposited into Alexei's bank account was far less than the level promised during the recruitment process. His pay slip contained multiple deductions, including accommodation fees, a GPS monitoring charge, equipment and maintenance shared costs, fuel overuse penalties, and punitive deductions for "failure to meet performance targets." By the second month, the company had completely stopped paying wages, telling drivers that it was experiencing "cash flow problems" and asking them to continue working with the promise that "all outstanding payment will be made at a later date."

Faced with long-term wage deductions and unpaid salaries, Alexei and the other drivers repeatedly sought an explanation but never received a clear answer. At the same time, they were scared to stop working because doing so could mean permanently losing the wages being withheld and potentially result in claims for substantial breach-of-contract penalties. Under GPS surveillance, drivers were also unable to deviate from routes without being fined. Combined with the pressure of having their wages controlled, the drivers had little choice but to continue working while hoping the situation would improve at some point.

urning point came in March 2023, when Alexei and more than 60 foreign drivers from different countries chose to park their trucks at a rest area on a German highway, where they displayed banners showing protest slogans and listing the amounts of wages owed to each driver. The strike was their only way to seek

outside assistance. This form of strike was the only way they had to ask the outside world for help. The drivers deliberately chose to protest in Germany rather than the company's home country because they believed they would have "greater protection" there.

Because the logistics company had long provided transportation services to numerous major enterprises, the incident became an important test case following the implementation of the "Supply Chain Due Diligence Act" (Lieferkettensorgfaltspflichtengesetz) in Germany. The central competent authority launched investigations and required the enterprise and its supply chains to explain whether they had fulfilled their obligations to identify and manage human rights risks. Follow-up official reports indicated that the government had conducted multiple audits involving similar cases and initiated administrative enforcement actions after identifying violations.

Analysis of forced labor items

- **Restriction of movement**: The employer misused the vehicle GPS tracking system to monitor the routes, stopping locations, and duration of stops taken by drivers in real time. Unauthorized movements or stops were prohibited, and wage deductions employed as an enforcement measure for any "violations." In practice, this substantially restricted workers' freedom of movement.
- **Withholding and deduction of wages**: The employer imposed excessive deductions under the pretext of accommodation fees, GPS monitoring charges, equipment and maintenance costs, fuel penalties, and failure-to-meet-performance-targets. The enterprise further delayed and even completely withheld wage payments, forcing workers to continue working without proper remuneration.

Consequences of involvement in forced labor

- **Collective strike by workers and public exposure of related issues**: Due to the long-term withholding of wages and restrictions on movement, ultimately foreign drivers organized a collective strike to seek external help, making public previously concealed forms of labor control.
- **Central competent authority intervention and systematic investigation**: After the incident, the related German authorities officially intervened and launched an investigation into the logistics company and its labor management practices to evaluate whether the case involved forced labor and violations of related labor laws.
- **Enhanced review of supply chain human rights responsibilities**: Because this company had long provided cross-border transportation services to major enterprises, the incident prompted companies and their upstream buyers to reassess their responsibility for managing human rights risks involving indirect suppliers.

Case 7: Closed management practices at a salt farm on a remote island

Under the scorching sun, the remote island salt farm was covered with white salt crystals, with the blinding glare and stinging salt particles part of daily life for those who worked there. Every day, workers were ordered to carry and process raw salt in the salt fields, working under extended exposure to the sun and almost no fixed rest areas. This was the world of A-ming (pseudonym).

When A-ming boarded the boat, he thought it was nothing more than changing workplaces. Having experienced long-term homelessness, he viewed the offer of accommodation and employment as a rare opportunity. However, it was only as the mainland gradually disappeared into the sea mist that he came to realize he had been taken to a place that was almost completely cut off from the outside world. The island had no public transportation or basic living amenities and communication signals were intermittent. That evening, the employer confiscated his identification documents to "prevent them being lost." A-ming quickly realized that not having his documents also meant losing his ability to leave the island. His world quickly shrank in size to the journey to and from the salt fields and a simple workers' bunkhouse. When he worked, how long he worked, and whether he could take breaks was decided entirely by instructions from the employer. Working too slowly led to verbal abuse, and any mention of leaving was met with warnings not to "cause trouble."

Only years later, after police received a report and conducted an investigation on the island was the long-standing practice of isolating workers and tightly controlling their work at the salt farm finally exposed. The case not only shocked the country but was also identified by several international human rights organizations as a high-risk supply chain case. Further police investigations revealed that many of the salt farm workers were homeless individuals or people with mild mental disabilities and extremely limited social support. The employer had deliberately targeted such individuals, so as to take advantage of their lack of familiarity with the law, limited access to assistance, and the absence of people willing to speak out on their behalf.

As the findings of the investigation reached international markets, U.S. Customs and Border Protection (CBP) determined that all related salt products were linked to forced labor and issued a WRO, prohibiting their import into the United States. Orders were canceled, shipments were seized and export channels rapidly disrupted. Ultimately, the employers involved were indicted for unlawful confinement, exploitation, and forced labor, and multiple salt farms operated by them were ordered to cease operations.

This case was a major wake up call for the industry: even traditional industries located in remote areas can be excluded from global markets through international import bans and trade restrictions if they are found to be involved with forced labor.

Analysis of forced labor items

- **Abuse of vulnerability**: The recruitment process mainly targeted individuals with weak social connections and limited ability to live independently. As a result, these workers lacked the ability to refuse unfavorable working conditions or seek assistance when faced with such conditions.
- **Retention of identity documents**: By confiscating workers' identification documents, the employer deprived them of the ability to prove their identity and move freely, effectively confining them to a specific workplace.
- **Isolation**: The employer exploited the remote location and limited transportation to prevent workers from seeking outside assistance.
- **Restriction of movement**: Workers were located on an offshore island with inadequate transportation and their identity documents were withheld. Collectively, these circumstances constituted restrictions on their freedom of movement.

Consequences of involvement in forced labor

- **The employer was investigated and its operations suspended**: After the case was exposed, the competent authority launched investigations into the island salt farm's operating practices. The employer was indicted for unlawful confinement, exploitation and forced labor. Operations at multiple salt farms operated by the employer were ordered suspended and their operating eligibility and related contracts simultaneously reviewed or revoked.
- **International trade sanctions (U.S. Import Ban)**: The U.S. CBP issued a WRO against the implicated salt farms, prohibiting their salt products from entering the U.S. market. As a result, shipments were seized, orders were canceled and major export channels disrupted.
- **Damage to industry reputation and supply chain trust**: International buyers reassessed the sources of their salt supplies. Some enterprises suspended cooperation or required renewed audits, causing the entire industry to be viewed as a high-risk supply chain and damaging its export reputation.

Case 8: The internship trap and academic credit coercion at a renowned resort

Hsiao Chieh (pseudonym) was a hospitality and culinary student who traveled to a renowned resort deep in the mountains to complete the internship credits needed to graduate. The resort was surrounded by beautiful scenery, with rooms often fully booked and considered a dream destination by many travelers. Hsiao Chieh initially believed that working here would provide him with valuable experience in high-end hotel management. He never imagined that what awaited him was not professional training but a working nightmare from which it was difficult to escape.

After the internship started, Hsiao Chieh quickly discovered there was no such thing as "being off work." Managers often used the excuse of staff shortages to force interns to continue working even after clocking off, sometimes keeping them on duty until 1 a.m. before they were allowed to rest. For dinner the hungry interns frequently had to eat cold food left over by guests, while managers always ate on time. Even more frightening, if one person failed to complete their tasks, no one was allowed to return to the dormitory. In this isolated mountain resort, with no transport, the interns had nowhere to go and were forced to endure the situation in silence.

When Hsiao Chieh and his classmates attempted to report about being overworked, the response was not the introduction of improvements but rather threats. Senior managers used their authority over internship "evaluations" as a weapon, implying that anyone who refused overtime work would receive a failing grade and might be unable to graduate. Messages from senior managers in group chats contained sarcastic remarks such as: "We are all healthy and capable. Look at others and reflect on yourselves. Do you still want to blame the Gods and accuse others?" These words were the straw that broke the camel's back.

Unable to tolerate the situation any longer, Hsiao Chieh and several classmates decided to take the risk of "escaping." Without telling senior managers, they took transportation down the mountain and traveled to a city government office more than 100 kilometers away to file a complaint. Although the enterprise later paid the unpaid overtime wages and disciplined or accepted the resignation of related managers, pressure and "appeals" from school teachers and human resources personnel eventually led the students to soften their stance and agree to a settlement. However, for Hsiao Chieh the experience revealed the darker side of certain school-industry cooperation programs. A hotel that was supposed to serve as a learning environment had instead exploited students' fear of being "unable to graduate," to turn them into a cheap, and even unpaid source of forced labor.

Analysis of forced labor items

- **Abuse of vulnerability**: The victims were interns and students participating in school-industry training programs. Graduation requirements and the pressure of academic credit, combined with the remote mountain location and

limited transportation options, placed them in a vulnerable position, highly dependent on the employer with limited ability to leave.

- **Intimidation and threats**: Senior managers exploited their authority over internship evaluations to explicitly or implicitly threaten students who refused to perform unpaid overtime would fail their internships (meaning potentially being unable to graduate). This was used to coerce students into providing labor, while the practice of collective punishment further created psychological pressure within the group.
- **Abusive working conditions**: Students were forced to work excessive hours late into the evening and sometimes until early morning, severely depriving them of the right to rest; Their basic right to food was also compromised (as they were only able to eat leftovers and given too little time to eat), creating an inhumane work environment.
- **Wage withholding and excessive overtime**: Students were required to continue working after clocking off, while deductions were made from wages or wages were not paid (including overtime pay). The threat of losing academic credits was used to force students to perform unpaid overtime work.

Consequences of involvement in forced labor

- **Damage to business reputation**: The scandal of a well-known resort exploiting students received extensive media coverage, severely damaging the company's brand image and consumer trust.
- **Administrative penalties and compensation**: The enterprise was forced to pay outstanding overtime wages, while facing labor inspections and potential penalties from the competent labor authorities.
- **Management changes**: The senior managers involved received serious disciplinary action or were forced to resign, while the enterprise's internal management systems were called into question.
- **Crisis in school-industry partnerships**: Schools and NGOs became involved in reviewing the situation, potentially making it more difficult for the enterprise to recruit future interns or being placed on a school-industry cooperation program blacklist.

Case 9: Mobilization in a raw material production region and a disrupted trade route

A certain major manufacturing country serves as a key global supplier of textile raw materials. Within the country, a specific inland region accounts for nearly 90% of national production and almost 20% of global textile output. Every autumn, when the boundless fields are covered with white crops and the harvest season begins, large numbers of workers from a certain ethnic group are sent to the area against their will. This is not ordinary seasonal employment. According to international investigative reports and disclosures from human rights organizations, the local government implements a large-scale "labor transfer" program. Local officials reportedly carry out quota-based mobilization efforts from household to household, "mobilizing" large numbers of ethnic minority workers away from their hometowns. Many of these individuals were previously held in "collective training facilities." After completing so-called "ideological transformation," they were transported in groups by dedicated trains or buses to factories and farms hundreds of kilometers away. Although the authorities claimed the program was intended to "alleviate poverty" and "create employment," within this top-down system of directives, refusal was not an option.

As allegations of forced labor gained international attention, an international organization responsible for certifying sustainable raw materials announced the suspension of certifications and authorizations for the region. Several internationally recognized apparel brands followed suit by announcing that they would stop sourcing raw materials from the area. Shortly afterward, lawmakers in a major export market introduced the "Forced Labor Prevention Act." This legislation changed traditional evidentiary responsibility by establishing an extremely strict "presumption of guilt" standard. As such, unless enterprises could produce "clear and convincing evidence" tracking and demonstrate every stage of their supply chain is completely free from forced labor, all products originating from the region would be presumed to involve forced labor and be prohibited from importation. In other words, if enterprises failed to conduct supply chain due diligence and used raw materials from areas associated with forced labor risks, their products could face customs enforcement actions in other countries and be denied entry.

Analysis of forced labor items

- **Abuse of vulnerability**: The status of the workers as members of an ethnic minority group and their politically vulnerable position (such as having previously experienced detention or being subjected to ideological education) make it difficult for them to refuse government-assigned labor quotas and placements. As a result, they were forced to enter into an involuntary employment relationship.
- **Restriction of movement**: Under a government-led labor transfer program, workers were forcibly relocated to workplaces using special trains and buses.

Worksites were reportedly surrounded by high walls, barbed wire, and extensive surveillance systems, while workers were subject to strict controls even outside working hours and unable to come and go freely.

- **Abusive working and living conditions**: Workers were required to perform intensive labor under strict surveillance and high-pressure conditions, often accompanied by compulsory political indoctrination sessions. Their living environments lacked privacy and respect for basic human dignity.
- **Intimidation and threats**: Many workers were previously detained in government-established detention centers or training facilities, placing them under significant psychological pressure. They understood that refusing government-assigned work would likely be considered disobedience and potentially result in renewed detention or other forms of punishment.

Consequences of involvement in forced labor

- **Legal sanctions and trade bans**: Major importing countries (such as the United States) implemented strict legislation based on the "rebuttable presumption" principle, effectively prohibiting imports of all products from the region, a devastating blow for export-oriented manufacturing industries.
- **Significant increase in corporate compliance costs**: Enterprises were required to invest substantial resources in supply chain traceability and due diligence to prove their products were free from forced labor risks. Failure to do so exposed them to the risk their products would be seized or returned.
- **Brand boycotts and production withdrawal**: To avoid involvement in forced labor controversies and potential violations of human rights regulations, international brands voluntarily announced they would stop buying raw material from the region and terminate cooperative relationships with local manufacturers. Many companies relocated their supply chains and production bases out of the area, resulting in substantial losses of export orders and the increased economic marginalization of the region.

Supplementary explanation: To address systemic forms of forced labor arising from national laws, policies, or practices, the ILO's 2025 Indicators of Forced Labour introduced a new "State-imposed forced labour" section (Particular case). The ILO indicates that as this type of forced labor is embedded within official systems, it is difficult for individuals to refuse and difficult to identify. Such practices include forced labor imposed for purposes of political punishment, economic mobilization, punishment for taking part in strikes, labor discipline, or discrimination. In addition, when a state abuses convention exceptions, such as compulsory military service, prison labor (particularly when serving private interests or involving individuals who have not been convicted), emergency situations, or civic duty, as soon as such practices exceed the narrow scope permitted under Forced Labour Convention, 1930 (No. 29), they constitute state-imposed forced labor.

8. Guidelines for enterprises on the Prevention of forced labor Q&A

1. On what standards are the Guidelines based?

- These Guidelines are primarily based on the operational framework for identifying forced labor proposed by the ILO (including the ILO Indicators of Forced Labour) and the ILO General Principles and Operational Guidelines for Fair Recruitment. They also reference the United Nations and Organisation for Economic Co-operation and Development (OECD) frameworks on enterprise human rights due diligence (HRDD) to establish a set of general principles for enterprises to prevent forced labor.
- The purpose of these Guidelines is to help enterprises identify forced labor risks and establish a practical and implementable management framework. Companies can also choose to adopt other international or industry standards, such as the Responsible Business Alliance Code of Conduct or SA8000, to meet the requirements of different customers or supply chains. However, compliance with industry standards or participation in third-party certification programs does not remove an enterprise's responsibilities under related laws or the principle of human rights due diligence. In other words, compliance with a particular industry standard does not automatically meet a company’s legal obligations or HRDD responsibilities.

2. Other than protecting human rights what are the practical impacts on enterprise operations of preventing forced labor?

- Around the world governments and international supply chains have established laws and regulations to prevent forced labor. In some markets, enterprises are required to provide evidence of supply chain due diligence and traceability to satisfy regulatory authorities or customers. Failure to effectively identify and manage related risks can result in market access restrictions, shipment seizures, contract termination, legal liability and other adverse consequences.
- By proactively implementing measures to prevent forced labor, enterprises not only demonstrate their commitment to protecting human rights, but also create a good corporate reputation which facilitates their long-term global business expansion, particularly in markets such as the European Union and the United States, by responding ahead of time to evolving international human rights requirements. Conversely, if a company is found to be associated with forced labor, it will not only have lasting harm to its corporate reputation, it could also result in the company’s products being seized by importing countries, and significant financial losses. Over the long term, such enterprise may also be blacklisted and excluded from global supply chains, resulting in canceled orders and loss of future business, ultimately jeopardizing its ability to participate in international supply chains.

3. Currently, what are the major laws or requirements in the global supply chain that prohibit products involving forced labor from being imported or result in brand companies canceling orders?

- Section 307 of the U.S. Tariff Act:
  This provision stipulates that any goods imported into the United States that are produced using forced labor can be subject to seizure and confiscation by U.S. Customs and Border Protection (CBP). During enforcement proceedings, if goods are detained or temporarily withheld, importers are generally required to submit evidence, including traceability records and due diligence documentation within a specified period of time to demonstrate the goods are not produced with forced labor and to apply for their release.
- European Union Forced Labor Regulation:
  The regulation was passed in December 2024 and will come into force on December 14, 2027. Under this regulation, the EU prohibits products made with forced labor from being sold in the EU market or exported from the EU to other countries. Once forced labor is determined by the European Commission or an EU Member State, the products concerned, regardless of industry sector or company size, will be prohibited from entering the EU market. Products already circulating within the EU face confiscation, seizure, or withdrawal.
- Supply chain / brand requirements: Using RBA as an example (commonly applied in the electronics industry):
  If an enterprise intends to export products to companies that are members of the Responsible Business Alliance (RBA), it may be required to provide relevant certification or verification under the RBA Validated Assessment Program (VAP). If forced labor is confirmed through an assessment, the company face revocation of related qualifications and risks losing access to that supply chain.

4. What situations can be identified as forced labor? What operational risks can companies face if they are found to be involved in forced labor?

Once an enterprise is found to have engaged in forced labor, it can face order cancellations, export disruptions, termination of cooperative relationships, and even reputational damage, resulting in real world impacts on business operations. The following situations are common indicators or scenarios used internationally to identify forced labor risks. However, whether a situation constitutes forced labor still requires a comprehensive assessment as to of whether it involves “involuntary work” and “labor is extracted through threats, penalties or restrictions on freedom.”

(1) Excessive overtime

- Scenario: A certain electronics supplier uses performance evaluations and contract renewal conditions to indirectly require employees to work excessive overtime over an extended period and imposes high breach of contract penalties to prevent workers from resigning.
- Actual impact: After receiving complaints, the brand customer cancels new orders from the electronics supplier and classifies the firm as high risk. The supplier is prohibited from receiving new orders from the brand until the related deficiencies are corrected.

(2) Debt bondage

- Scenario: A major manufacturing company is accused of requiring foreign workers to pay high labor brokerage fees before obtaining employment. To repay those debts, the workers are forced to remain in their original positions long-term, creating a typical case of "debt bondage."
- Actual impact: The company's products are subject to an import seizure order issued in an importing country, disrupting exports. Although the company later reimburses the fees and adopts a zero-fee policy, it still remains uncertain whether the import restrictions have been lifted. The company has already suffered losses amounting to several billion New Taiwan dollars.

(3) Harsh working and living conditions

- Scenario: Foreign workers are housed in an unsafe corrugated iron dormitory. The employer requires them to live inside the factory premises, imposes a curfew to restrict their movement, and fails to provide clear information regarding alternative housing options and related rules. As a result, the workers become highly dependent on the employer and are unable to refuse the dangerous living conditions.
- Actual impact: A major accident results in casualties including fatalities. The company is not only required to pay substantial compensation, the responsible person is found guilty of a crime, which has a serious impact on business operations and corporate governance.

(4) Withholding wages

- Scenario: A certain logistics operator makes improper deductions for accommodation fees, equipment costs, and penalties, while also delaying wage payments, forcing drivers to continue working in order to maintain their income.
- Actual impact: The situation triggers strikes and media attention. Several business partners suspend cooperation with the logistics operator due to reputational concerns, damaging both operations and corporate reputation.

(5) Abuse of vulnerabilities

- Scenario: A certain tourism operator exploits the dependence of interns and vocational trainees on academic credits and graduation requirements by making students continue working without pay after clocking off.
- Actual impact: The competent authority requires the operator to pay unpaid wages and suspends its eligibility to participate in educational cooperation programs. The company's brand image suffers significant damage following public reporting of the incident.

5. How should companies use the "Forced Labor Risk Self-Assessment Checklist" in the Guidelines?

- Companies can use the "Forced Labor Risk Self-Assessment Checklist" as an important tool for "internal risk identification and preventive management." By conducting self-assessments, enterprises can identify potential risks at an early stage and reduce operational risks arising from future external investigations, or disclosures.
- When completing the checklist, enterprises should review each assessment item against current practices. They are also encouraged to examine existing documents and records, such as labor contracts, payroll records, work-time records, recruitment policies, and related management regulations. This helps companies develop a more objective and comprehensive understanding of their current situation.
- If the assessment show that certain items are "partially compliant" or "non-compliant," enterprises should first identify these items, further evaluate the level of risk, and use the results as a basis to develop improvement measures, adjust management systems, and arrange an improvement timetable.
- The purpose of self-assessment is not to require enterprises to immediately achieve the highest standards or complete all improvements at once. It is intended to help companies understand their current risk exposure, identify areas for improvement, and continuously optimize management practices through incremental improvement, thereby achieving the goal of preventing forced labor.

6. Will the results of the "Forced Labor Risk Self-Assessment Checklist" be used as a basis for future brand auditing or legal penalties?

- No. The "Forced Labor Risk Self-Assessment Checklist" is an internal tool designed to help enterprises review their own practices and manage risk. Its purpose is to help companies identify potential risks at an early stage and plan improvements in advance. It will not be used as a basis for government penalties or brand audits.
- The results of the self-assessment are intended solely for purposes of internal management and continued improvements. Enterprises can complete the

assessment and honestly examine their current performance. However, if a company identifies related risks through the self-assessment but then makes no effort to introduce improvements over an extended period, such inaction could still be considered an indication the company's risk management and internal controls need to be strengthened in future external audits, complaints, or investigations.

7. How should companies make improvements if the self-assessment identifies items that are "partially compliant" or "non-compliant"?

If the self-assessment results indicate certain items are only "partially compliant" or "non-compliant," enterprises should introduce improvements based on the level of risk, through a phased and prioritized approach. The focus is on "first stopping harm, then implementing improvements, and continued tracking." Improvement measures to be adopted include:

(1) Immediately cease any related improper practices to ensure identified risks do not continue or increase.

(2) Initiate internal reviews or investigations to clarify the scope of impact, the number of affected workers, and severity of risks involved.

(3) Develop concrete and actionable improvement plans that clearly define improvement objectives, improvement measures, responsible departments and an implementation timetable.

(4) Provide remedies when workers' rights are impacted, such as refunding improperly collected fees, payment of backpay or adjusting wages.

(5) Establish ongoing tracking and internal control mechanisms to regularly review the progress and effectiveness of improvement measures and ensure related measures are properly implemented.

8. If an enterprise's self-assessment identifies violations of forced labor indicators, particularly "debt bondage," will taking early action and proactively introducing improvements help reduce the operational risks faced by the company?

- If an enterprise promptly introduces improvements in response to the results of its self-assessment, this can serve as important evidence that the company is proactively seeking to control risks. Such actions not only help prevent the firm from being found non-compliant by customers or external audit organizations and facing penalties, but also reduces operational risks. In addition, if an enterprise successfully obtains international certification through its improvement efforts, it can help protect its brand reputation, gain the trust of brand companies, consolidate existing business relationships and create additional business opportunities.

- In practice, “debt bondage” is often regarded as a high-priority issue. If enterprises can deal with this as soon as possible the problem can be prevented from continuing and expanding which substantially reduces the total amount of fees the company may need to reimburse affected workers.
- When a company discovers a situation involving debt bondage, recommended risk management methods include:

  (1) Immediately stop improper deductions or arrangements that require workers to repay their debts through the provision of labor.

  (2) Review and revise recruitment and management systems.

  (3) Reimburse workers for recruitment fees and related costs already paid.

  (4) Incorporate an improvement plan into internal control procedures and regular audit items.

- Positive real-world cases can also serve as references. For example, a certain Taiwanese traditional manufacturing company voluntarily underwent assessment and compliance reviews by the Fair Labor Association (FLA) beginning in 2011 and adopted a zero-fee recruitment policy. As a result, foreign workers were not required to pay labor brokerage fees, were able to retain their own travel documents, maintained freedom of movement, and received clear information about basic employment conditions before leaving to work in Taiwan. Through these measures, the enterprise not only successfully obtained certification, but also established a good reputation, gained greater trust from brand customers, and continued to receive orders from multiple internationally recognized brands.

9. If self-assessment identifies violations of forced labor indicators, what government or private organizations can enterprises seek assistance from in introducing improvements?

- Enterprises may lack sufficient experience and capability to accurately determine whether they have violated forced labor indicators. In such cases, they should consider proactively introducing external audit mechanisms (certification programs including RBA and SA8000). When enterprises need to explain to stakeholders their current situation and improvement measures, conducting external audits can demonstrate the company has taken necessary risk management action.
- Enterprises are encouraged to consult professional advisory teams and after considering the role of the company in the supply chain, the expectations of important stakeholders and whether third-party certification is required, make the choice best suited to the needs of the company.
- Adopting the “zero-fee principle” has become a global trend in supply chains and human rights due diligence. Enterprises can utilize services provided by

the Ministry of Labor's Direct Hiring Service Center (website: https://dhsc.wda.gov.tw/ or the 1955 Hotline or (02) 6613-0811). By adhering to lawful and transparent recruitment channels, it is possible to reduce the recruitment fees and related debt burden of foreign workers at source.

10. Does the government provide any assistance measures to help enterprises avoid violations of forced labor regulations?

- In addition to issuing the Guidelines, the Ministry of Labor (MOL) works with the Ministry of Economic Affairs (MOEA) to organize awareness-raising sessions for enterprises, while promoting the Guidelines and the "Expanded Direct Hiring Program" to help enterprises better understand and align with international fair recruitment standards.
- In addition to jointly organizing awareness sessions with the MOEA, the MOL also independently holds multiple sessions to promote the Guidelines. It also provides consultation services to individual enterprises and produces promotional materials, including manuals, infographics, simplified guides, and Q&A documents, to enhance employer understanding of forced labor and human rights risks and reduce operational risks. Enterprises with questions regarding the employment of foreign workers or direct hiring services should call the MOL 1955 Consultation Hotline.

Addendum 1. Forced Labor Risk Self-Assessment Checklist

Instructions for completing the self-assessment checklist:

1. The self-assessment checklist helps enterprises establish policies and mechanisms to prevent forced labor. However, companies still need to proactively review and verify their practices based on the latest applicable international regulations, trade agreements, business conduct standards, and mandatory requirements in importing countries. Enterprises should also continuously strengthen their due diligence to ensure all stages of the supply chain are compliant with related standards.
2. The "Risk Level Assessment" section of the self-assessment checklist is intended to serve as a basis for enterprises to prioritize corrective actions and improvement measures. Related definitions are as follows:
   - High Risk: Could result in death or severely impact the health of affected individuals, significantly reducing their quality of life or life expectancy.
   - Medium Risk: Violates basic living needs or human rights and has a significant impact on an individual's employment, health, safety, or rights.
   - Low Risk: Other impacts that do not reach the level of high or medium risks.
3. When conducting self-assessments, enterprises can reference the "List of Internal Enterprise Documents and Records" provided for each indicator to prepare the relevant materials. If enterprises conduct interviews with stakeholders or anonymized questionnaires, proper records should be kept.

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #1: Abuse of Vulnerability				

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
1-1	Work assignments are based on objective standards such as skills and certifications, with no differential treatment based on personal background such as ethnicity or nationality	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
1-2	The workplace is free from harassment, bullying, and discrimination. Managers do not exploit employee vulnerabilities (such as language difficulties when communicating, older age, physical or mental issues etc.) to treat individuals improperly	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
1-3	Workers are free to choose their own accommodation and food and are not restricted or forced to accept arrangements made	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations	☐ Fully compliant; no improvement required ☐ Can be improved immediately

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
	by the company, employer, or labor brokerage	☐ Medium risk ☐ Low risk	☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Can be completed within ____ months
1-4	Workers retain their original identification documents and independently undertake administrative procedures required to maintain their legal status	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
1-5	Recruitment and remuneration policies are fair, and workers are not subject to differential treatment due to special life circumstances (such as being displaced or impacted by a disaster)	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
			(1) Name of measures: _____ (2) Description of additions/revisions: _____	
1-6	Contracts with domestic and overseas labor brokerages include provisions that prohibit charging workers fees, withholding identification documents, or restricting resignations. Contracts also include penalties for labor brokerage violations and termination clauses	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
1-7	Regular audits/inspections are conducted of domestic and overseas labor brokerages (which can include interviews with workers or inspections conducted in their countries of origin)	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions:	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
			_____	

List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 20)

☐ Complaint mechanism or complaint forms

☐ Audit Reports

☐ Enterprise policy commitments and management documents

☐ Employee roster

☐ Copies of passports and identification documents

☐ Labor contracts / work rules

☐ Disciplinary records

☐ Recruitment policy

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #2: Deception				
2-1	Actual working conditions (wages, location, accommodation) are consistent with the terms and conditions promised during the recruitment process	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
2-2	When workers arrive at the place of employment, they are provided with information on local living conditions and workers' rights in their native language or another language that can be easily understand	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
2-3	The recruitment process is transparent and workers voluntarily accept employment on the basis of full understanding	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 21)

☐ Complaint mechanism or complaint forms	☐ Audit Reports	☐ Enterprise policy commitments and management documents	
☐ Employee roster	☐ Labor contract	☐ Recruitment advertisements	☐ Pay slip
☐ Recruitment policy	☐ New hire training records		

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #3: Restriction of Movement				
3-1	Workers can freely enter and leave the workplace	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
3-2	No physical restrictions are imposed in the workplace or dormitories, such as locked doors, fences, or guards blocking workers access or movement	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
3-3	Surveillance equipment is used for legitimate security purposes and not to restrict workers' freedom of movement	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
3-4	Workers are free to choose their own means of transport, with transport provided by the company just one available option; workers are not required to use it, and are not accompanied or monitored during journeys	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
3-5	Workers are free to choose their place of residence and not forced by employers or labor brokerages to live in designated dormitories	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 22)

☐ Complaint mechanism or complaint forms	☐ Audit Reports	☐ Enterprise policy commitments and management documents	
☐ Workplace layout diagrams	☐ Work rules / security measures	☐ Dormitory regulations / life rules	☐ Identity document retention policy and access record

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #4: Isolation				
4-1	For workers employed in remote areas (factory sites), measures have been taken to avoid the life inconveniences caused by the geographical location	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
4-2	Workers have the freedom to communicate and can contact their families, social groups, or NGOs without interference	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
4-3	The personal communication devices of workers are not confiscated or held by others	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
4-4	Workers' social lives are respected, and there are no policies or regulations that seek to restrict their social interactions	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
4-5	Language or cultural adaptation measures are adopted to help foreign workers integrate into the local community	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
4-6	For workers employed on fishing vessels, basic communication facilities (such as internet access or public telephones) are provided. If fees are charged, they must be in line with market rates	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
4-7	All business premises are legally registered, allowing law enforcement authorities or third-party organizations to locate them and determine the circumstances of workers at any time	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 23)

☐ Complaint mechanism or complaint forms	☐ Audit Reports	☐ Enterprise policy commitments and management documents	
☐ Workplace layout diagrams	☐ Labor contract/work rules	☐ Factory / company registration	☐ Others: Documentation on measures taken to reduce workers' geographic isolation and integrate foreign workers into the local community

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #5: Physical and Sexual Violence				
5-1	Preventive mechanisms are in place to prevent managers from abusing their authority by engaging in coercion or acts of violence	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
5-2	Workers are not controlled through the use of drugs or alcohol	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
5-3	There is a zero-tolerance policy on workplace violence and harassment implemented through training and incorporated into day-to-day management	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
5-4	Workers who experience workplace violence or harassment are able to file complaints in their native language or another language they are familiar with. The complaint channel has clear procedures, rules and is confidential	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
5-5	Disciplinary measures imposed on workers are fair, proportionate and do not involve violence	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 24)

☐ Complaint mechanism or complaint forms

☐ Audit Reports

☐ Enterprise policy commitments and management documents

☐ Occupational injury and medical treatment records

☐ Training records

☐ Labor contract / work rules

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #6: Intimidation and Threats				
6-1	Managers do not engage in any form of intimidation, threats, or verbal abuse toward workers	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
6-2	The disciplinary system does not include coercive measures such as withholding wages or reducing the living standards of workers	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
6-3	Managers or labor brokerages do not coerce workers into compliance by threatening their family members or friends	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
6-4	Managers or recruitment agencies do not use intimidation or coercion to prevent workers from resigning	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
6-5	Workers have a range of channels to file complaints. Complaint procedures and processes are clear and highly confidential, ensuring workers can raise concerns without fear of having their identities disclosed or being subjected to intimidation, threats, retaliation, or any other form of retaliation	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 25)

☐ Complaint mechanism or complaint forms	☐ Audit Reports	☐ Enterprise policy commitments and management documents
☐ Disciplinary methods and records	☐ Training records	☐ Resignation / termination related records

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #7: Retention of Identity Documents				
7-1	The identification cards, passports, or travel documents of workers are not withheld for any reason	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
7-2	If a worker voluntarily agrees to have their documents placed in safekeeping, the arrangement must specify a return period, and the worker retain the unconditional right to retrieve the documents at any time	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 26) ☐ Complaint mechanism or complaint forms ☐ Audit Reports ☐ Enterprise policy commitments and management documents ☐ Documentation management measures and procedure related documents ☐ Foreign workers Living Care Service Plan				

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #8: Withholding of Wages				
8-1	The labor contract clearly details how wages are calculated in a language familiar to the worker	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
8-2	Wages are paid in full and on time on a designated payday	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
8-3	Each payday, workers receive a detailed pay slip in a language they understand (including all wage payments and deductions)	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
8-4	Wages are deposited directly into a bank account opened and controlled by the worker	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
8-5	Workers' wages are not withheld or deducted in the form of security deposits,	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified)	☐ Fully compliant, no improvement required	☐ Fully compliant; no improvement required

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
	breach of contract penalties, deposits, compensation etc.	↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Can be improved immediately ☐ Can be completed within ____ months
8-6	Any lawful deductions (such as board and lodging fees) are clearly stipulated in the employment contract in a language familiar to the worker and itemized on the pay slip	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
8-7	Verification mechanisms are in place for dispatched workers (including outreach foreign workers) to ensure their wages are paid in full	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations	☐ Fully compliant; no improvement required ☐ Can be improved immediately

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
		☐ Low risk	☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Can be completed within ____ months
8-8	Workers have access at any time to attendance records, overtime records and other supporting documents used to calculate their wages	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 27) ☐ Complaint mechanism or complaint forms ☐ Audit Reports ☐ Enterprise policy commitments and management documents ☐ Wage payment and payroll records ☐ Pay Slips ☐ Attendance records				

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #9: Debt Bondage				
9-1	Workers are not required to repay any advance wages or loans through the provision of labor	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
9-2	Enterprises should adopt the "employer pays" principle, under which all recruitment-related fees are covered by the enterprise. If it is discovered that workers previously paid related fees a refund/remediation process has been established to reimburse the workers	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 28)				
☐ Complaint mechanism or complaint forms		☐ Audit Reports	☐ Enterprise policy commitments and management documents	
☐ Pay slip		☐ Loan and advance wage records	☐ Recruitment policy	☐ Labor recruitment and employment related fee payment records

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #10: Abusive Working and Living Conditions				
10-1	Safety training materials and notices are in languages workers can understand	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
10-2	Individuals operating dangerous machinery have received appropriate training and obtained required certification	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
10-3	Workers are provided with necessary personal protective equipment, which is regularly replaced	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations	☐ Fully compliant; no improvement required ☐ Can be improved immediately

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
		☐ Low risk	☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Can be completed within ____ months
10-4	The working and living environments indicates a basic respect for human dignity and is not overcrowded, unsanitary or lacking in privacy	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
10-5	Dormitories are equipped with clean water, sanitary facilities and located away from dangerous areas involving flammable, explosive or harmful materials, as well as areas with excessive vibrations or noise	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
10-6	Workers have the right to choose their own place of residence and are not forced to live in designated dormitories	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
10-7	Channels exist through which workers can complain about working and living conditions	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 29) ☐ Complaint mechanism or complaint forms ☐ Audit Reports ☐ Enterprise policy commitments and management documents				

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
☐ Occupational injury and illness report ☐ Training record		☐ Maintenance or inspection records	☐ Workplace layout diagrams	☐ Dormitory regulations / life rules

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
Forced Labor Indicator #11: Excessive Overtime				
11-1	Workers are entitled to statutory leave and reasonable rest time when at work	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months
11-2	Workers have the right to refuse overtime. As such, any extension of work hours by an employer must be based on the consent of the worker. Enterprises should implement an overtime approval and total overtime control mechanism to ensure actual work hours remain within legal limits and there are no excessive working hours	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
11-3	All overtime hours worked by employees are compensated in accordance with the law or converted into compensatory leave	☐ Fully compliant (no risk) ☐ Partially compliant / Non-compliant (risk identified) ↳ ☐ High risk ☐ Medium risk ☐ Low risk	☐ Fully compliant, no improvement required ☐ Situation can be addressed with existing regulations ☐ New/revised regulations are required (1) Name of measures: _____ (2) Description of additions/revisions: _____	☐ Fully compliant; no improvement required ☐ Can be improved immediately ☐ Can be completed within ____ months

List of internal enterprise documents and records to be reviewed (for explanations on the use of each type of information see page 30)

☐ Complaint mechanism or complaint forms ☐ Audit Reports ☐ Enterprise policy commitments and management documents

☐ Employee roster ☐ Work time records (attendance records) ☐ Overtime application and consent form ☐ Labor contract / work rules

Item No.	Assessment of enterprise current status	Risk level assessment	Additional or revised measures	Improvement timetable assessment
☐ Resignation/employment termination and final settlement records				

Reference documents

1. Ministry of Labor (2023) “Reference Handbook on the Prohibition of Forced Labor” https://www.mol.gov.tw/1607/28162/28166/28168/65152/65188/post
2. Department of Investment Promotion, Ministry of Economic Affairs (October 2025) “Corporate Human Rights Due Diligence” Operational Manual (first draft) https://www.pwc.tw/zh/news/events/assets/2025-legal-hddr-04.pdf
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