EUROPEAN COMMISSION
DIRECTORATE-GENERAL INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP AND SMES

Compliance and Responsible Business Conduct

SMEs Anti-Forced Labour Preparedness Checklist: how to avoid selling or exporting products made with forced labour in the EU market

Under the EU Forced Labour Regulation (FLR), placing products made with forced labour on the EU market is prohibited (obligation of result).

The actions below provide non-compulsory simplified guidance to help SMEs, especially **small** businesses, mitigate risks and source responsibly. This guidance is based on the Guidelines on the application of the Forced Labour Regulation, which include suggestions on possible measures proportionate to the size and resources of SMEs.

This SME Anti-Forced Labour Preparedness Checklist is for guidance only and does not constitute legal advice and does not replace the EU Forced Labour Regulation (EU 2024/3015) or its official guidelines. Following this checklist does not guarantee compliance or confer protection against investigations. The European Commission accepts no liability for actions taken based on this document. Users must refer to the Regulation text and its implementing guidelines for legal certainty and remain fully responsible for their own compliance.

It is complemented by links to further sources of help, such as national contact points and business networks, both within the EU and abroad, and links to IT tools that are freely available on the market.

An SME specific webinar and sector specific webinars are organised to provide further support. Please register here.

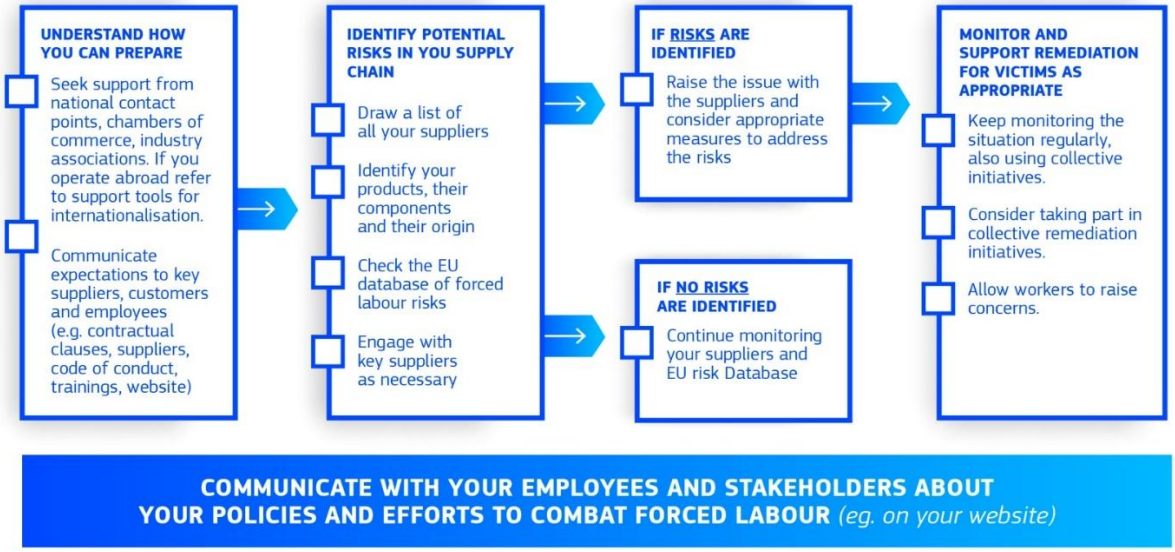
For further support please continue monitoring the Forced Labour Single Portal for updates.

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Anti-Forced Labour Preparedness Checklist

How to avoid selling products made with forced labour in the EU



SOURCES FOR EXTERNAL AND EXPERTISE

Guidelines on the application of the Forced Labour Regulation
Member States national contact points on forced labour
Other resources available on the Forced Labour Single Portal

Understand how you can prepare for compliance with FLR

(See section 6.4.1 in the Guidelines)

Consider contacting national contact points, chambers of commerce and industry associations for support and potential preventing measures. If you operate abroad refer to support tools for internationalisation.

Communicate forced labour policies and expectations to key suppliers, employees and customers as necessary, for example:

- For suppliers: include contractual clauses on forced labour and/or suppliers code of conduct or consider requesting supplier certifications or self-declarations, integrate forced labour policies into procurement processes.
- For employees: give a brief practical training to staff or publish the policy in the company's intranet.
- For customers: post the policy on the company's website or social media.

Identify and assess forced labour risks in your supply chain and business relationships

(See section 6.4.2 in the Guidelines)

Draw a list of all your suppliers (name, production site, headquarters (if different), products/components sourced).

Identify your products and components and their origin.



Check the EU database of forced labour risks (under development) to determine whether any of your products (including components or raw materials) or regions of origin of your suppliers are at risk of forced labour).

Engage with key suppliers as necessary.

Where necessary, consider checking cost-free supply chain tracing tools and sector-specific resources available here to better understand the risks involved in your supply chain.



No risk identified? Keep monitoring your suppliers and the EU risk database regularly.



Risks are identified? Proceed to next step.

Address risks and engage with suppliers

(See section 6.4.3 of the Guidelines)

If a risk of forced labour is identified, raise the issue with the relevant suppliers and consider appropriate measures to address it. Such measures may include:

- Prevention or corrective action plans (ask your business association or chamber of commerce)
- Adapt or modify business practices by clarifying that failure to address the issue will impact the decision to continue or renew the contract or to place additional orders in the future.
- Make use of collective leverage to affect change in other companies (e.g. with other business partners or sectoral initiatives).
- If the situation does not improve and the risk cannot be addressed, consider disengagement.[1]

Consider asking your supplier at risk for relevant information, such as:

- Their policy on forced labour.

[1] Disengagement should always be an option of last resort. Larger companies are expected to use their resources to address the situation with the supplier before considering alternative sourcing.

- Evidence on efforts to identify, prevent or mitigate the risk of forced labour (e.g. supplier trainings, codes of conduct, product traceability systems, grievance mechanisms, collaboration with NGOs, due diligence efforts).
- Traceability documentation showing the origin of the sourced products at the tier where the risk is identified or if not possible supplier certification or self-declaration.
- If your suppliers are subject to a ban decision (from 2028 onwards), ask for confirmation that the products concerned are not covered by the decision.

Continue monitoring and support remediation for forced labour victims as appropriate

(See section 6.4.4, 6.4.5 and 6.4.6 of the Guidelines)

Keep monitoring the situation regularly. Consider including dedicated checks as part of regular supplier monitoring processes.

Use collective initiatives to monitor risks. SMEs can participate in industry or multi-stakeholder efforts, integrate forced labour checks into existing processes, and track a small set of meaningful indicators to assess the effectiveness of due diligence measures.

Consider taking part in collective remediation initiatives by working with industry associations, NGOs, trade unions, multi-stakeholder initiatives and other SMEs.

Allow workers or other stakeholders to safely raise concerns for example through a dedicated communication channel (e.g. a dedicated mailbox, online message applications, suggestion boxes). Where possible, use established industry or multi-stakeholder mechanisms rather than setting up your own.

Communicate about your efforts to combat forced labour

Consider communicating on your efforts to combat forced labour across the process, including measures adopted to address forced labour, via simple communication actions, such as updating your website, including information in your annual reports or sharing monitoring results with employees and key stakeholders.