

SAYARI

500

Technology Fast 500
2022 NORTH AMERICA
Deloitte.

**Inc.
5000**



**RiskTech
100 2023**



**Chartis
RiskTech Quadrant®
Category Leader
WatsonAI Monitoring
Solutions, 2022**

The evolving challenge of forced labor compliance: Why it's more important than ever

Armando Muñoz

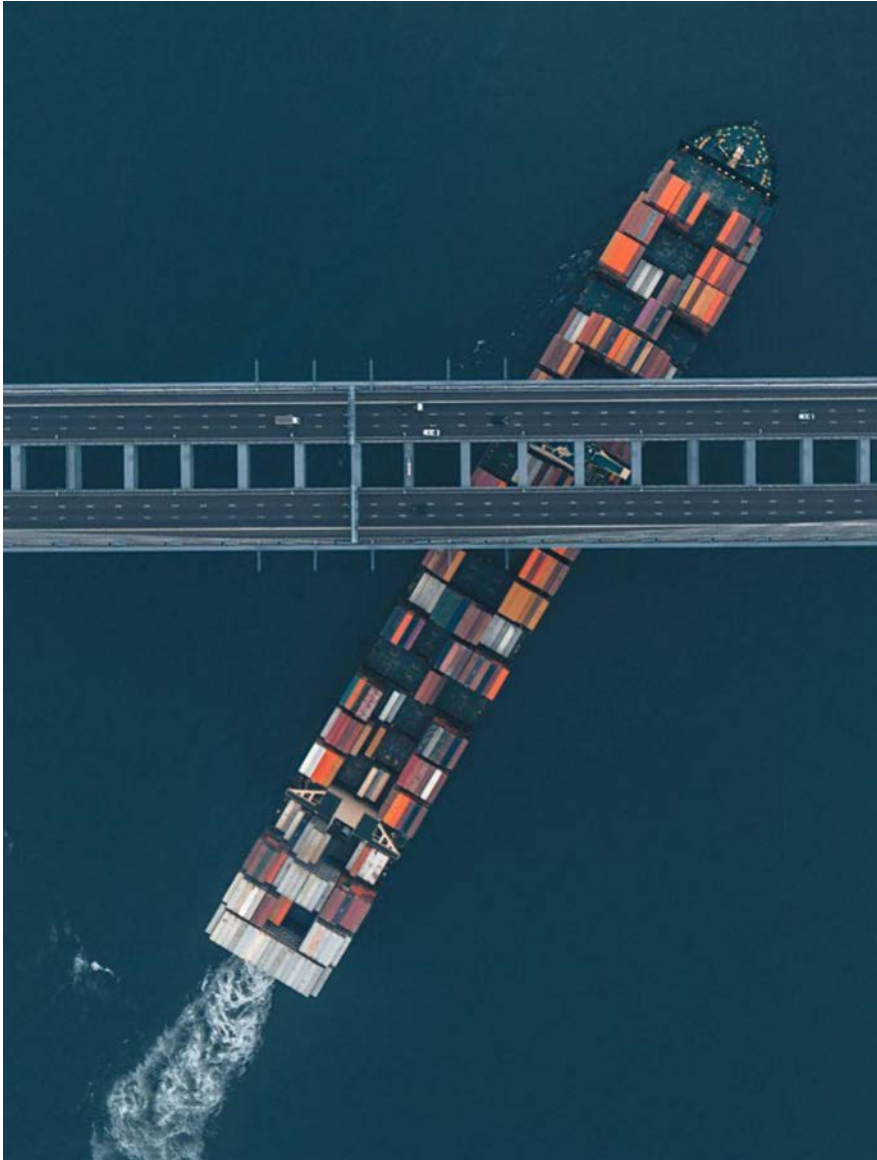
Senior Solutions Consultant

February 4, 2026

Advanced Topics in Customs Compliance

Agenda

1. Regulatory Compliance
2. Beyond Compliance
3. Proactive Strategies
4. Trends and Outlook



SAYARI

Regulatory Compliance



Definition

According to the ILO
Forced Labour
Convention, 1930 (No.
29), **forced or compulsory**
labour is:

"all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."

Evolution

SAYARI

2003 - 2010

2015 - 2018

2017 - 2023

2021 - 2025+

Phase

Emergence

Transparency

Due diligence

Enforcement

Key
Characteristic

Targeted
registries

Mandatory
reporting

Risk
management

Trade
restrictions

Dominant
Mechanism

"Name and
shame"

Public
disclosure

Civil liability

Import &
export bans

Beyond Compliance

SAYARI



Risk of non-compliance

SAYARI

Reputation & Brand Equity

Consumer Backlash: Loss of loyalty and active boycotts from value-driven demographics.

Brand Devaluation: Permanent erosion of brand equity and customer trust following adverse media.

Loss of Partnerships: Immediate termination of contracts by ethical retailers, investors, or manufacturers.

Operational Resilience

Supply Chain Restructuring: Immediate need to find new sources following the discovery of "tainted" suppliers.

Cost of Remediation: Unplanned financial outlays to compensate workers for past abuses.

Talent Attraction & Morale: Difficulty recruiting and retaining staff who prioritize working for ethical organizations.

Financial & Investor Relations

Investor Divestment: Large-scale exit of institutional capital due to ESG concerns.

Access to Capital: Loss of credit facilities from state and private banks for listed companies.

Equity Volatility: Rapid decline in market valuation following federal enforcement actions or exposés.

Calls to action

Visibility

Mitigation

Proactivity

Strategies to eliminate forced labor from your supply chains



PROACTIVE RISK IDENTIFICATION

Access up-to-date analysis of counterparty health, ownership, reputation, and indirect affiliations often missed by traditional screening.



CIRCUMVENTION DETECTION

Map critical supply chain connections to reveal hidden risks instantly with connected graph database and visualization tools.



SUPPLY CHAIN VISIBILITY

Visualize the trading relationships of upstream suppliers instantly and scalably with multi-jurisdictional trade data, ESG scoring, and risk assessment.

I. Proactive Risk Identification

- ▶ **Automated Screening and Continuous Watchlist Monitoring**

Modern compliance relies on automated systems that cross-check supplier databases against global enforcement lists.

- ▶ **Typological Risk Identification**

Beyond official lists, companies can identify risk by looking for specific operational patterns that signal exploitation.

- ▶ **Ownership is a “new” pillar of due diligence:** Vetting suppliers now requires exploring the corporate networks behind them. Recent legislation, such as that concerning "Foreign Entities of Concern," makes understanding the ultimate ownership of a supplier a critical part of due diligence to mitigate risks related to forced labor or national security.

II. Circumvention Detection

- ▶ **View trade traversals to identify if shipments follow key illicit transshipment typologies, such as:**
 - Goods do not require further manufacturing but stop at transit points
 - Goods traverse through known transshipment hubs
- ▶ **Review corporate information**
 - View company footprint consolidated from authoritative sources across multiple jurisdictions such to understand indicators recency of establishment
 - Assess company information such as business purpose against what was declared in shipments
- ▶ **Assess information against what's provided on the Bill of Lading**
 - Check to see if the Bill of Lading (BOL) or other docs do not identify the same country of origin as the purchase order or commercial invoice
 - Review volumes and monetary values entered and HS codes declared to track unusual behaviors

III. Supply Chain Visibility

- ▶ **Sub-tier visibility is non-negotiable:** The new era of trade compliance demands looking beyond your immediate Tier 1 suppliers. Risks and regulatory scrutiny now extend deep into the supply chain and make visibility of sub-tiers a necessity, not an option.
- ▶ **Internal trade data isn't enough:** Relying solely on internal data is insufficient for today's proactive, strategic approach to compliance. Leveraging granular trade data across jurisdictions is crucial to anticipate regulatory scrutiny, identify where components are truly coming from, and prepare the necessary documentation to avoid costly fines and detentions.
- ▶ **Trade data alone isn't enough:** Layering corporate connections with supply chain networks enables more comprehensive visibility into corporate operations and relationships to paint a more full picture of risks introduced within global business networks.

February 4, 2026
ATCC Conference

SAYARI

Proactive Risk Identification with Sayari

Trusted by regulators and the regulated



URBAN OUTFITTERS

facebook



cerberus



Honeywell



valmont



Deloitte.



D | DOW JONES



JPMORGAN CHASE & Co.



Amundi Pioneer ASSET MANAGEMENT

Manulife

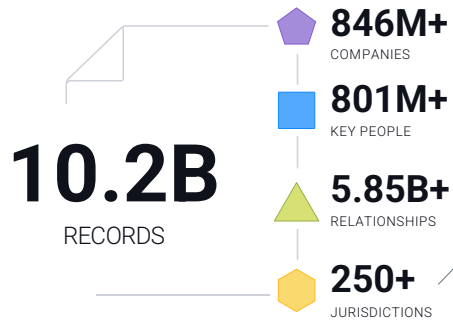
REFINITIV



SOCIETE GENERALE



RAYMOND JAMES



Find More, Faster

Sayari is the **commercial risk intelligence platform** purpose-built to provide analysts and investigators with worldwide visibility into the relationships between businesses and individuals.

- ▶ HARNESS THE WORLD'S DATA INSTANTLY
- ▶ LEVERAGE UNSTRUCTURED, DISPARATE DATA
- ▶ ILLUMINATE COMMERCIAL & SUPPLIER CONNECTIONS
- ▶ EXPOSE YOUR NETWORK'S HIDDEN RISKS

We harvest billions of documents pulled in from hundreds of databases.

We extract, resolve, and match millions of entities.

We map billions of relationships into pre-computed graph visualizations.

We surface possible exposure to dozens of risk types.



Forced Labor

Detect potential forced labor risk in your supply chains with Sayari Graph's comprehensive risk factors, and Sayari Map's automated, product-specific supply chain maps — including upstream suppliers — based on real trade data.

Select Sources

- ▶ Uyghur Forced Labor Prevention Act (UFLPA)
- ▶ US DHS CBP Withhold Release Orders (WRO)
- ▶ Sheffield Hallam University Forced Labor Reports (SHU), including intermediary entities
- ▶ Sheffield Hallam University Useful Resources
- ▶ Australian Strategic Policy Institute (ASPI) Forced Labor Report
- ▶ Xinjiang Production and Construction Corps Contractors

Select Methodologies

- ▶ Entity Registered in Xinjiang
- ▶ Entity Located in Xinjiang
- ▶ Xinjiang Operations, Xinjiang Keywords, and Keywords Found in Company Attributes

Surface Highest Risk Entities

SAYARI GRAPH Entities Trade Search entities and records Advanced search Translate

Forced Labor Scr...

Entities Graphs Searches Records Uploads Last Modified: Today at 2:52 PM Filters

Matches Any Entity Any Countries Any Direct risk Any Risk categories Any Tags Any + add

Table Dashboard Map

Total Entities

75

Entities at Risk

44 ⚠

Percent at Risk

59% ⚠

Distribution of Entities at Risk by Risk Factor

- ⚠ Adverse media Elevated 3
- ⚠ Export controls High 8
- ⚠ Forced labor Critical 37
- ⚠ Political exposure High 8
- ⚠ Regulatory action High 2
- ⚠ Sanctions High 5
- ⚠ Sanctions and export control lists Critical 2

Entities at Risk (44)

- Imports Components in USA Bureau of Industry and Security (BIS) Common High Priority Items List (May Include 'PSA' Path) Elevated (1)
- Forced labor
- ⚠ Xinjiang-Geolocated Entity High (22)
- ⚠ Xinjiang-Registered Entity High (21)
- ⚠ WRO Entity Critical (14)
- ⚠ UFLPA Entity Critical (13)
- 洛浦县美馨发制品有限公司
- 新疆佳噶尔棉麻有限公司
- 新疆佳噶尔棉麻有限公司
- 洛浦县美馨发制品有限公司
- 新疆生产建设兵团
- 和田浩林发饰品有限公司
- 和田市泰达服装有限公司
- HOSHINE SILICON INDUSTRY CO LTD
- 新疆生产建设兵团
- 和田市泰达服装有限公司
- 和田浩林发饰品有限公司
- 合肥宝龙达信息技术有限公司
- HOSHINE SILICON INDUSTRY CO LTD

Distribution of Entities by Country

Country	Count
CHN	43
MEX	30
USA	17
VNM	13
KOR	10
IDN	9
JPN	8
CAN	7

Assess Risk Exposure

SAYARI GRAPH Entities Trade Search entities and records Advanced search Translate

Forced Labor Scr...

Entities Graphs Searches Records Uploads Last Modified: Today at 2:52 PM Filters

Matches Any Entity Any Countries Any Direct risk 1 Risk categories Any Tags Any + add

Table Dashboard Map Fields shown 11

<input type="checkbox"/>	Entity	Matches	Country	Direct Risk	Tag	
> <input type="checkbox"/>	新疆准噶尔棉麻有限公司	<input checked="" type="checkbox"/> Manual match 1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Forced labor		⋮
> <input type="checkbox"/>	新疆准噶尔棉麻有限公司	<input checked="" type="checkbox"/> Manual match 1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Forced labor		⋮
> <input type="checkbox"/>	新疆生产建设兵团	<input checked="" type="checkbox"/> Manual match 1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Forced labor		⋮
> <input type="checkbox"/>	新疆生产建设兵团	<input checked="" type="checkbox"/> Manual match 1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Forced labor		⋮

4 Results Results per page 35 < >

Identify Seed Risk

The screenshot displays the SAYARI GRAPH interface. At the top, there is a search bar with the text "Search entities and records" and buttons for "Advanced search" and "Translate". Below the search bar, the entity name "新疆佳尔棉..." is visible. The left sidebar contains navigation options: "Entity Navigation", "Profile", "Relationships", "Trade", "Attributes", "Risk factors" (with a count of 11), "Negative News", "Records" (with a count of 95), "Explore", and "Possibly same as" (with a count of 1). The main content area shows the entity's "Registration / Incorporation Date" as 1991-02-20 and "Company Type" as CO LTD. Below this, the "Risk Factors (11)" section is displayed, listing 11 risk factors categorized into three groups: "Forced Labor (9)", "Export Controls (1)", and "Political Exposure (1)".

Registration / Incorporation Date 1991-02-20

Company Type CO LTD

Risk Factors (11)

This section lists all Risk Factors associated with the selected entity, sorted by risk level and type.

- Forced Labor (9)**
 - ▲ CRITICAL (3)
 - UFLPA Entity
 - Entity from Sheffield Hallam University Forced Labor Reports
 - WRO Entity
 - ▲ HIGH (6)
 - Xinjiang-Registered Entity
 - Owner of Xinjiang-Based Entity
 - Xinjiang Production and Construction Corps (XPCC) Contractor
 - Owned by Xinjiang-Based Entity
 - Entity with Xinjiang Keyword
 - Xinjiang-Geolocated Entity
- Export Controls (1)**
 - ▲ HIGH (1)
 - Procurement Activity in High-Risk Jurisdiction
- Political Exposure (1)**
 - ▲ HIGH (1)
 - Owned by Chinese State-Owned Enterprise

The graphics and tables in this entity profile include ownership and control data aggregated across an entity's PSA (Possibly Same As) group. PSA resolution consistently collects entities into groups that likely refer to the same real-world entity.

Upstream Ownership Preview

This diagram shows a selected view of the company's upstream ownership structure. It indicates beneficial, majority, or otherwise significant ownership. If available in source documents, any shareholding percentages below 10% are excluded. View a complete network by adding the entity to a graph.

[See More in Graph](#)

Understand Relationship to Risk

The screenshot displays the SAYARI GRAPH interface. At the top, there is a search bar with the text "Search entities and records" and a search icon. To the right of the search bar are buttons for "Advanced search", "Translate", and a user profile icon. Below the search bar, there is a navigation bar with a home icon, a breadcrumb "Forced Labor Scr...", and a highlighted entity "Xinjiang Junggar...".

The main content area is divided into two columns. The left column, titled "Entity Navigation", contains a list of categories with corresponding counts: Profile, Relationships, Trade, Attributes, Risk factors (11), Forced labor (9), Export controls (1), Political exposure (1), Risk relevant (2), Additional risk (3), Negative News, Records (95), Explore, and Possibly same as (1). The right column, titled "See Source Records", displays several risk factors for the selected entity:

- Owned by Xinjiang-Based Entity** HIGH
Description: The entity is possibly owned (minority, majority, or wholly) by a Xinjiang-based entity up to 3 hops away via direct shareholding relationships with 10% or more controlling interest, including beneficial owner, owner, shareholder, partner, subsidiary, or branch. Applicable to entities globally.
Below is a preview of the risk network. Risk networks may expand to additional entities in Graph view. [List] [Diagram]
- Entity with Xinjiang Keyword** HIGH
Description: The company name suggests the entity may conduct business in Xinjiang, a region designated as high risk for forced labor practices. Applied to entities derived from Chinese and trade data sources.
- Xinjiang-Geolocated Entity** HIGH
Relevant Address: Building 38, Section 12, Junken Road, Wujiagu City, Xinjiang
Context: Geographic coordinates indicate that the entity is based in Xinjiang, China, a region designated as high risk for forced labor practices. Excludes entities exclusively derived from trade data sources.
- Export controls (1)**
Procurement Activity in High-Risk Jurisdiction HIGH
Description: This entity appears in government procurement records – either as a contractor or agency – in China, Russia, or Venezuela. These jurisdictions are subject to U.S. export controls under §744.21 of the Export

At the bottom of the interface, there is a vertical sidebar with the text "SAYARI".

Flag Risk Beyond the List

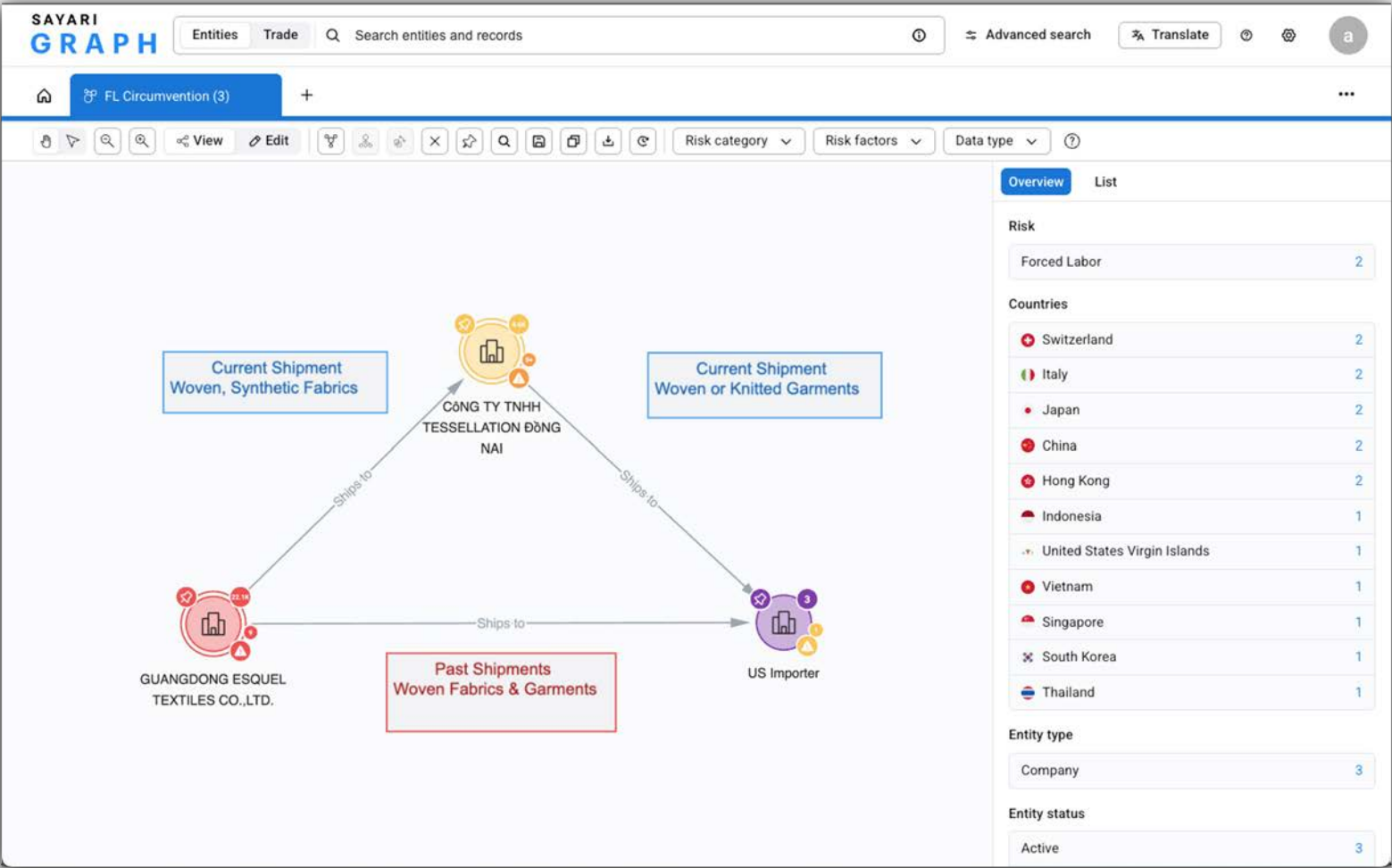
The screenshot displays the SAYARI GRAPH interface. At the top, there is a search bar with the text "Entities Trade" and "Search entities and records". Below the search bar, the current graph is titled "Xinjiang Junggar..." and "Unsaved Graph 1 (3)". The main area shows a graph with two nodes: "Xinjiang Guoxing Agricultural Development Group Co., Ltd." (top) and "State-owned Assets Supervision and Administration Commission of the Sixth Division of Xinjiang" (bottom). A blue line connects them, labeled "Shareholder of 96.28%". Both nodes have a yellow icon with a bar chart and a red warning triangle. To the right, there are three data panels, each with a red warning triangle icon. The first panel is titled "Company Record from China Company Directory (Alqicha)(Web Crawled Data)" and lists "Acquisition Date: 2025-11-27", "Shares", "Monetary Value - 963,600,000", and "Percentage - 96.28%". The second panel is titled "Company Record from China NECIPS" and lists "Publication Date: 2024-10-29", "Shares", "Monetary Value - 963,600,000", and "Percentage - 96.28%". The third panel is also titled "Company Record from China NECIPS" and lists "Publication Date: 2024-03-03", "Shares", and "Monetary Value - 963,600,000". At the bottom right of the data panels, there is a button labeled "+ Add Relationship Reference".

February 4, 2026
ATCC Conference

SAYARI

Circumvention Detection

Surface Trade Relationships



February 4, 2026
ATCC Conference

SAYARI

Supply Chain Visibility

Automate Supply Chain Mapping

SAYARI MAP Suppliers Alerts 20+ Uploads Translate

SHENNAN CIRCUITS CO

SHENNAN CIRCUITS CO Tag 0 No status

Product 1 Components Any Risk factors Any Ships to Any Ships from Any Arrival date Any Export Search for an Entity

Tier 1 Tier 2 Tier 3 Tier 4

SHENNAN CIRCUITS CO

NOKIA SOLUTIONS AND NETWORKS I... WT MICROELECTRONICS CO LIMITED

AVIC JONHON OPTRONIC TECHNOLOG... TEXAS INSTRUMENTS SOUTHEAST AS...

CỘNG TY TNHH REFONTECH VIỆT NA... NEXPERIA BV

STMICROELECTRONICS INC

Công ty TNHH COMPAL (Việt Nam... ALLEGRO MICROSYSTEMS PHILIPPIN... MAXIM PHILIPPINES OPERATING CO... FOXCONN HON HAI TECHNOLOGY IND... CÔNG TY TRÁCH NHIỆM HỮU HẠN FU...

SIIX EMS PHILIPPINES INC

ELEKTRONIKA SALES PRIVATE LIM... BOSCH AUTOMOTIVE ELECTRONICS I...

ASMPT SMT SINGAPORE PTE LTD ASMPT INDIA PRIVATE LIMITED

Overview All tiers

Total suppliers	9,766
Total suppliers at risk	6,081

Exposure by risk

Forced labor	18,983
Export controls	2,921
Environmental risk	2,016
Political exposure	390
Adverse media	155
Regulatory action	145
Sanctions	142
Sanctions and export control lists	14

Top upstream countries

View Supply Chain Details

The screenshot displays the SAYARI MAP interface for viewing supply chain details. The main header includes the SAYARI MAP logo, navigation tabs for Suppliers, Alerts (20+), and Uploads, and utility buttons for Translate, a home icon, and a user profile icon.

The current view is for SHENNAN CIRCUITS CO, indicated by a blue header bar. Below this, there are filters for Product (1), Components (Any), Risk factors (1), Ships to (Any), Ships from (Any), and Arrival date (Any). An Export button and a search bar for entities are also present.

The main content area is divided into three sections:

- Tier 1:** SHENNAN CIRCUITS CO
- Tier 2:** NOKIA SOLUTIONS AND NETWORKS LTD, Công Ty TNHH Jabil Việt Nam, PT OSI ELECTRONICS, CÔNG TY TNHH SAMSUNG ELECTRONICS, and CENTUM ELECTRONICS LIMITED.

The **Supply route** section provides detailed information for selected entities:

- ZHEJIANG DUNAN INTERNATIONAL TRADING CO LTD (Tier 4):** Includes a risk factor for Forced labor (+1 risk factor).
- SAMSUNG ELECTRONICS CO LTD (Tier 3):** Includes a risk factor for +5 risk factors.

The right-hand panel shows details for ZHEJIANG DUNAN INTERNATIONAL TRADING CO LTD, including a description in Chinese, 24 Sources, and specific risk factors:

- Forced labor (1):** A risk factor.
- Owned by Xinjiang-Based Entity (High):** The entity is possibly owned (minority, majority, or wholly) by a Xinjiang-based entity up to 3 hops away via direct shareholding relationships with 10% or more controlling interest, including beneficial owner, owner, shareholder, partner, subsidiary, or branch. Applicable to entities globally. [View Risk Factor](#)
- Other risk (1):** A risk factor.
- Forced labor (4):** A risk factor.
- Exports Goods with ILAB Forced Labor Risk (Elevated):** The entity exported a shipment with an HS code and country of origin covered by the U.S. Department of Labor List of Products Produced by Forced Labor. [View Risk Factor](#)

Verify from Shipment Record

SAYARI MAP Suppliers Alerts 20+ Uploads Translate

SHENNAN CIRCUITS CO

SHENNAN CIRCUITS CO +6 Tag 0 No status

Product 1 Components Any Risk factors 1 Ships to Any Ships from Any Arrival date Any Export Search for an Entity

Supply route

Tier 1: SHENNAN CIRCUITS CO

Tier 2: NOKIA SOLUTIONS AND NETWORKS LTD, Công Ty TNHH Jabil Việt Nam, PT OSI ELECTRONICS, CÔNG TY TNHH SAMSUNG ELECTRONICS LTD, CENTUM ELECTRONICS LIMITED

Ships to

Tier 4
ZHEJIANG DUNAN INTERNATIONAL TRADING CO LTD
Forced labor +1 risk factor
1

Components 2
8543 Specialized Electrical Machines
3506 Adhesives

Tier 3
SAMSUNG ELECTRONICS CO LTD
+5 risk factors

Ships to

Components 1
8542 Integrated Circuits

Shipment details

8543 Specialized Electrical Machines
Electrical machines and apparatus, having individual functions, not specified or included elsewhere in this chapter
3 shipments 75%
Departs from [Red dot] Earliest shipment 2023-01-18
Arrives in [Cross] Latest shipment 2023-03-27

3506 Adhesives
Prepared glues and other prepared adhesives, n.e.c. or included; products suitable for use as glues or adhesives, put up for retail sale as glues or adhesives, not exceeding 1kg net weight
1 shipment 25%
Departs from [Red dot] Earliest shipment 2023-03-02
Arrives in [Cross] Latest shipment 2023-03-02

February 4, 2026
ATCC Conference

SAYARI

Trends & Outlook

Current Enforcement Landscape

SAYARI

- ▶ **UFLPA Escalation:** The **Uyghur Forced Labor Prevention Act (UFLPA)** remains the primary enforcement tool. As of early 2026, the UFLPA Entity List has expanded to over 145+ entities, a significant increase from 2024.
- ▶ **New Priority Sectors:** Enforcement has moved beyond cotton and solar. In 2025, the Forced Labor Enforcement Task Force (FLETF) added copper, lithium, steel, caustic soda, and red dates as high-priority sectors.
- ▶ **Recent WRO Actions:** Active **Withhold Release Orders (WROs)** were recently issued/modified for:
 - **Palm Oil:** FGV Holdings Berhad (*Modified - Lifted January 2026*)
 - **Automobile Tires:** Linglong International Europe D.O.O. Zrenjanin (December 2025)
 - **Apparel:** Firemount Group Ltd. (November 2025)
 - **Bicycles, Parts, & Accessories:** Giant Manufacturing Co. Ltd. (September 2025)
 - **Seafood:** Chinese-flagged vessel *Zhen Fa 7* (May 2025)
 - **Sea Salt:** South Korean *Taepyung Salt Farm* (April 2025).
- ▶ **Volume:** In FY 2025, CBP stopped over 7,300 shipments valued at more than \$160M for forced labor reviews, with the automotive and electronics sectors seeing the highest volume of detentions. It is estimated

Outlook for 2026: What to Expect

SAYARI

- ▶ **AI-Driven Targeting:** CBP is transitioning from manual reviews to **AI and data analytics** to identify "look-alike" shipments and high-risk Harmonized Tariff Schedule (HTS) codes in real-time. (*CBP Directive No. 1450-030*)
- ▶ **Focus on Transshipment:** Expect "Deep-Dive" audits on goods entering from third-party countries (e.g., Vietnam, Thailand, Malaysia) to detect the diversion of Xinjiang-linked inputs through neutral manufacturing hubs.
- ▶ **Logistics Liability:** 2026 will likely see increased scrutiny of **intermediaries**. Freight forwarders and customs brokers face higher risks of civil penalties if they "knew or should have known" about forced labor in the supply chains they facilitate.
- ▶ **Isotopic Testing Standardization:** Isotopic and DNA testing will likely become a standard "clear and convincing" evidence requirement for importers seeking shipment release. Would be applicable to non-XUAR cotton considering the potential for XUAR-derived seeds being used to expand cotton production outside of XUAR (Kazakhstan by Xinjiang Lihua Group).

February 4, 2026
ATCC Conference

SAYARI

Recap

Recap



PROACTIVE RISK IDENTIFICATION

Surface list-based and non-obvious associated risks to detect vulnerabilities before they escalate.



CIRCUMVENTION DETECTION

Uncover hidden relationships with enhanced network visibility to assure integrity while reducing investigation time.



SUPPLY CHAIN VISIBILITY

Automate and scale supply chain mapping to identify reveal hidden supply chain relationships.



LOOKING FORWARD

CBP is implementing AI-driven targeting and stricter carrier and broker requirements, while standardizing isotopic testing to identify inputs possibly diverted through or derived from third-party production hubs.

February 4, 2026
ATCC Conference

SAYARI

Thank you!