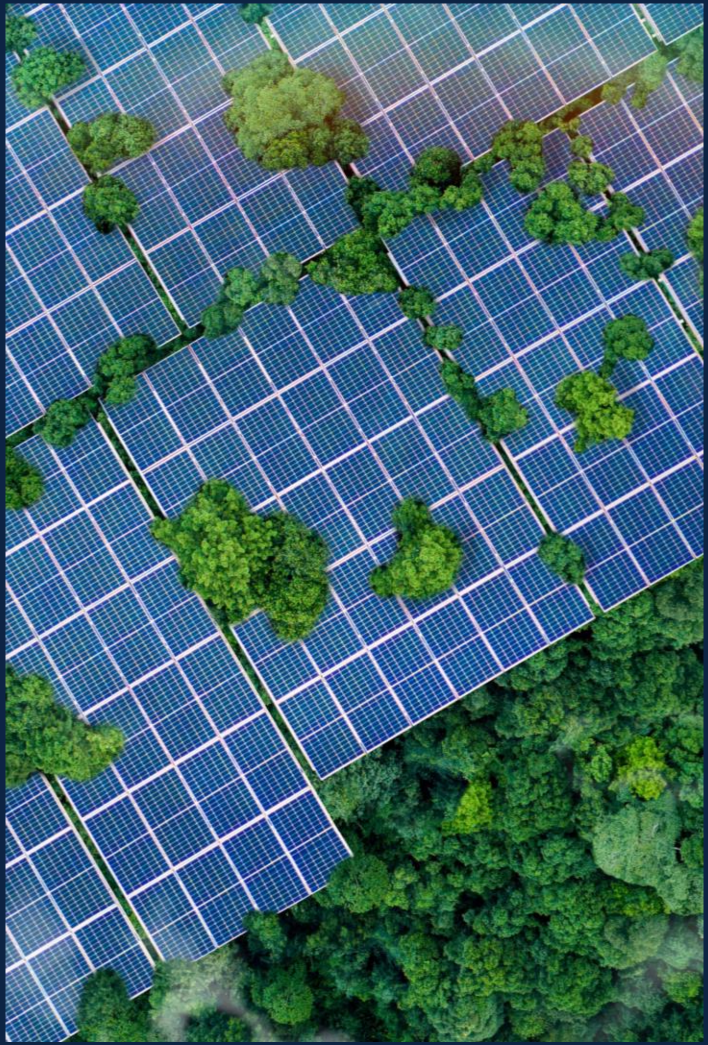

Special Supply Chain Report | August 2025

Forced Labor and Greenwashing Drive ESG Compliance

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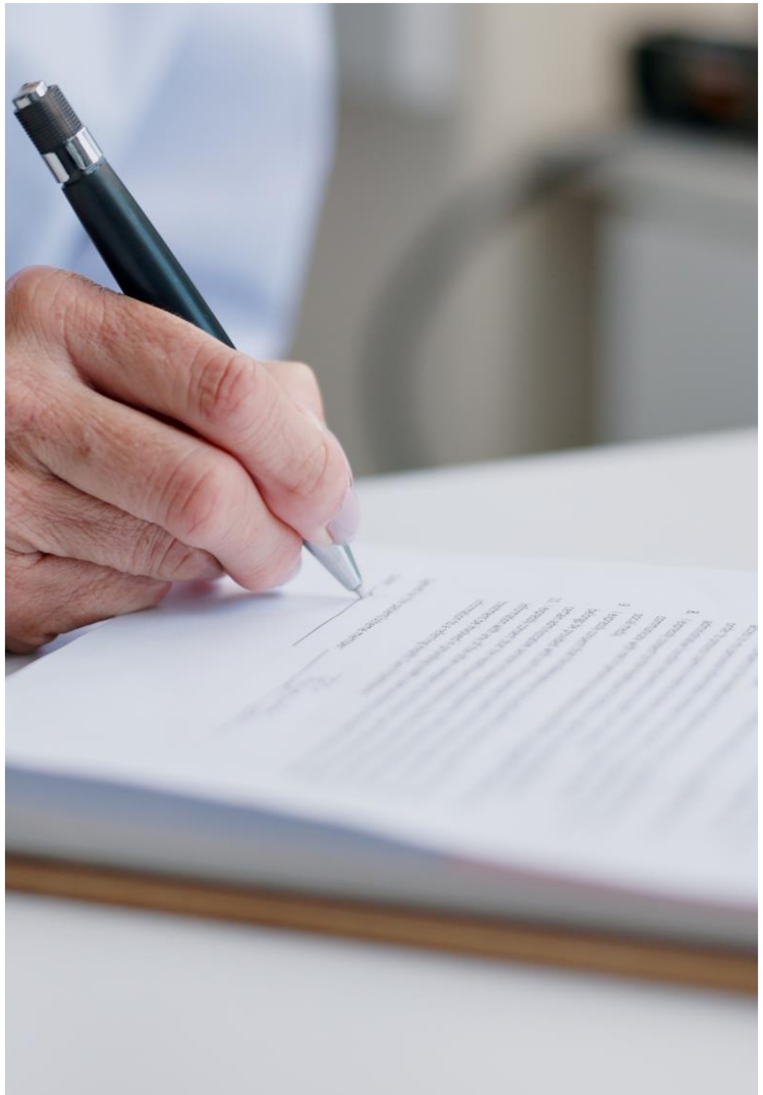


Executive summary

This special report provides a strategic analysis of the evolving ESG compliance landscape, highlighting new EU forced labor rules, supply chain due diligence directives, deforestation reporting, and green claims uncertainty. In 2025, shifting regulations and enforcement trends are reshaping global supply chains, requiring stronger ESG risk management to avoid disruption and maintain trust. Resilinc's report offers practical insights and actionable recommendations to help organizations anticipate enforcement milestones, mitigate operational risks, and build resilience in the face of accelerating regulatory change.

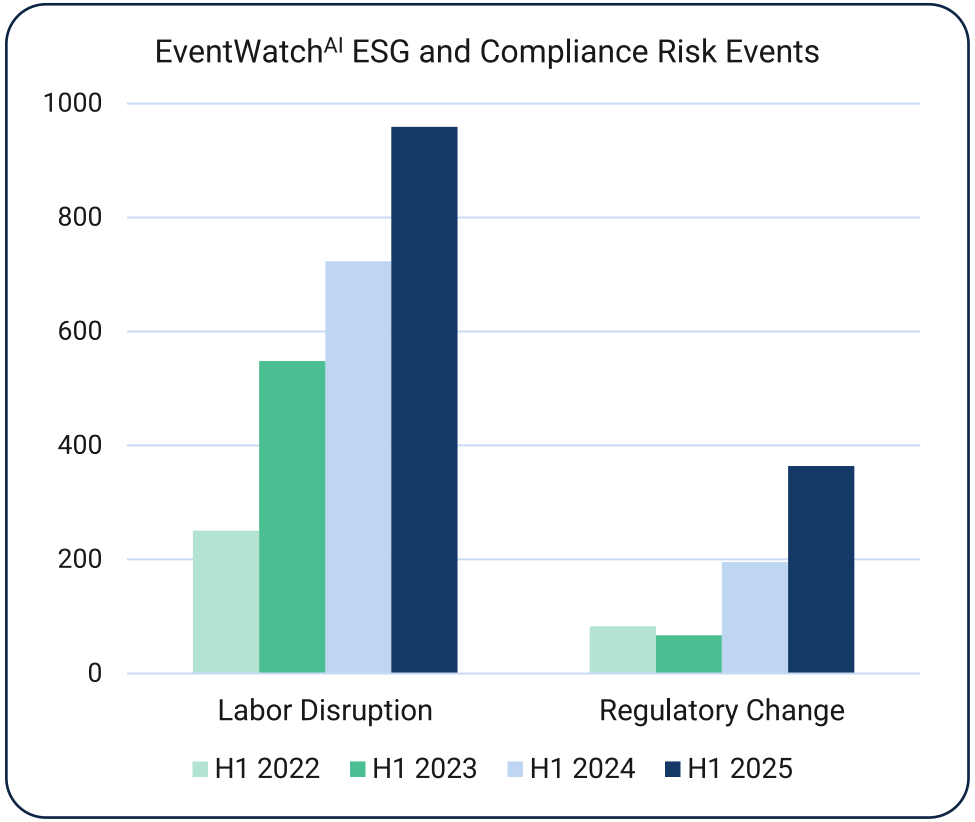
Key insights

- The EU Forced Labor Regulation takes effect December 14, 2025, empowering Member States to ban products linked to forced labor from the single market.
- The EU Deforestation Regulation is delayed until December 30, 2025, but is still expected to disrupt sectors that represent over €80B in annual EU imports.
- The CSDDD is under revision to reduce reporting burdens, but it will still require thousands of companies to integrate environmental, social, and governance (ESG) compliance and ESG risk management into contracts, climate plans, and board oversight.

01 EventWatchAI data and analysis

EventWatch^AI data: ESG and compliance

Resilinc's 24/7 monitoring platform, EventWatch^AI, scans millions of news sources worldwide and sends alerts on events that could cause potential supply chain disruptions, result in compliance issues, or impact pricing due to geopolitical and regulatory change events.



Labor Disruption and Regulatory Change Data Analysis

Data from Resilinc's EventWatch^AI highlights steep escalation across labor and regulatory categories between H1 2024 and H1 2025, underscoring how workforce instability and shifting laws are converging into dual supply chain risks.

- Labor Disruptions rose 33% YoY. Strikes, walkouts, and layoffs intensified across transportation and manufacturing hubs, with sustained spikes in aerospace, automotive, and logistics sectors.
- Regulatory Changes nearly doubled, rising 86% YoY. These increases track closely with the rollout of EU Carbon Border Adjustment Mechanism (CBAM) reporting requirements, U.S. tariff hikes, and new ESG disclosure mandates, all of which raised compliance burdens across global supply chains.

Together, these parallel surges highlight a mounting challenge: suppliers face both immediate disruption from labor unrest and longer-term structural risk from regulatory change, pressuring procurement teams to expand risk monitoring and resilience planning.

EventWatch^{AI} data: ESG and compliance

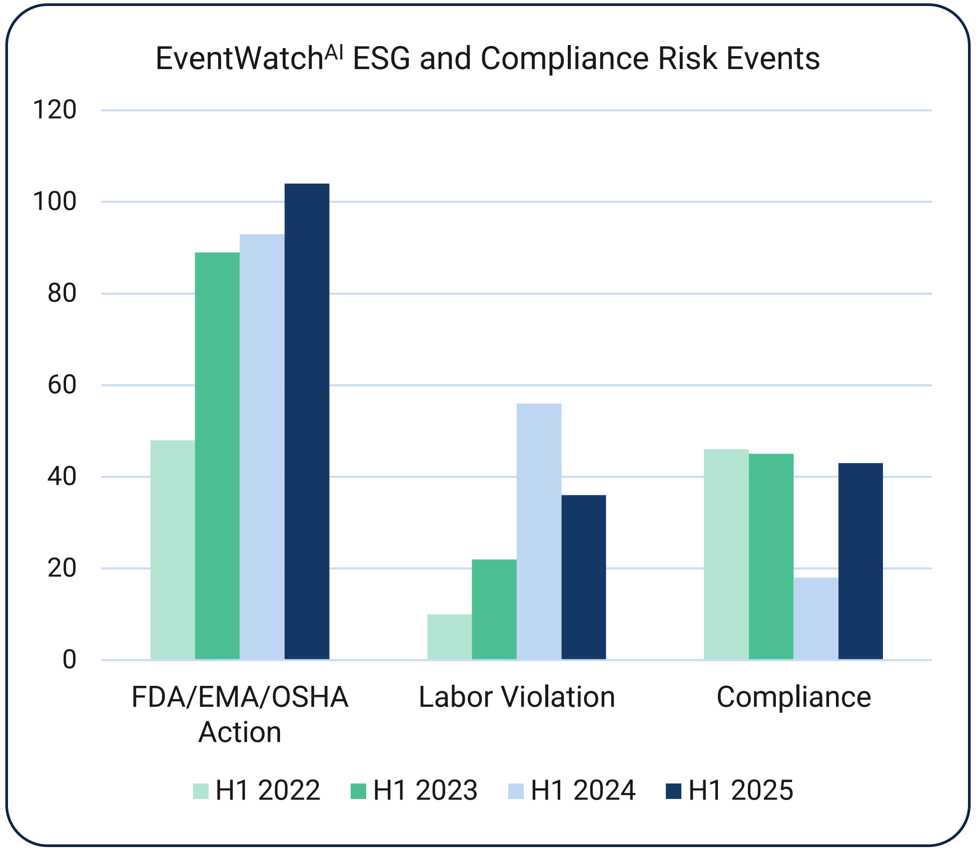
Resilinc's 24/7 monitoring platform, EventWatch^{AI}, scans millions of news sources worldwide and sends alerts on events that could cause potential supply chain disruptions, result in compliance issues, or impact pricing due to geopolitical and regulatory change events.

FDA/EMA/OSHA Action, Labor Violation, and Compliance Data

Data from Resilinc's EventWatch^{AI} shows rising regulatory enforcement and ESG scrutiny across key compliance categories between H1 2022 and H1 2025.

- FDA/EMA/OSHA Actions more than doubled between H1 2022 and H1 2025. The upward trajectory reflects heightened post-pandemic inspections, increased medical device recalls, and more.
- Labor Violations spiked sharply in H1 2024 before moderating in H1 2025. The surge coincided with stricter enforcement of forced labor and modern slavery regulations, highlighting both supply chain exposure and reputational risk.
- Compliance events remained relatively flat across the period, with a drop in H1 2024. The temporary low in H1 2024 suggests enforcement attention shifted toward labor and regulatory categories before normalizing again.

These trends show regulators increasingly focused on safety, labor rights, and ESG-linked transparency, underscoring the need for companies to strengthen quality management systems, labor due diligence, and audit-ready reporting.



02 Labor compliance risks

EU forced labor regulation takes effect December 2025

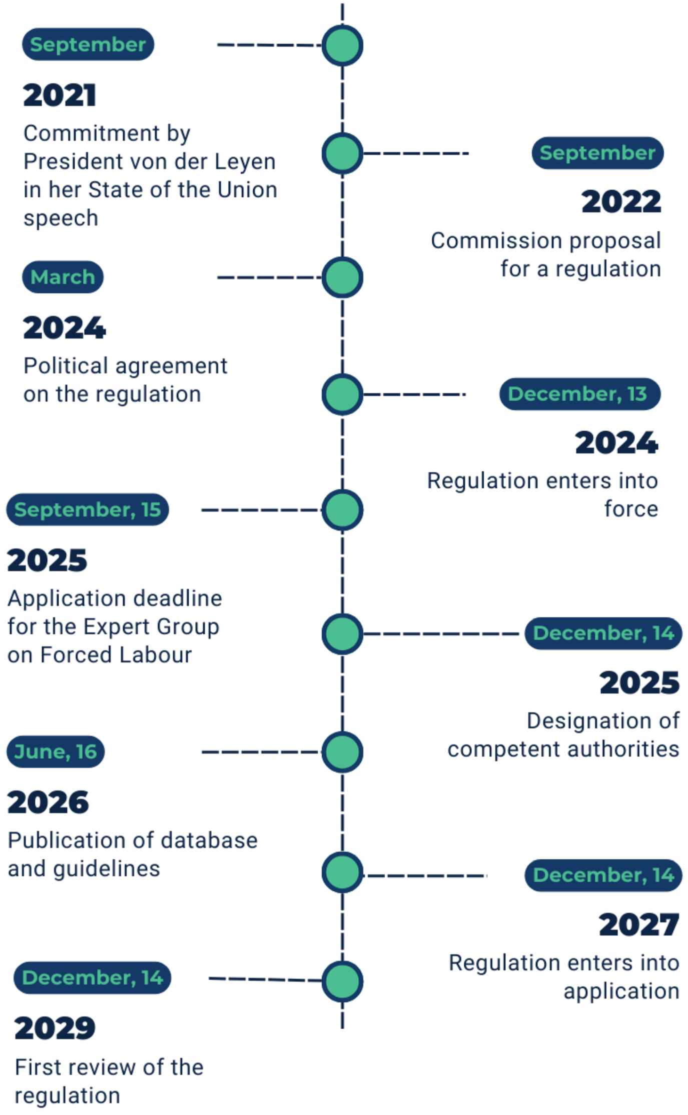
Regulation Overview

The new EU regulation prohibits all goods made with forced labor from entering or circulating in the EU market, regardless of their origin. This includes items produced within the EU or imported from abroad, for domestic use or export[1].

- By December 14, 2025: EU Member States must designate national authorities responsible for enforcing the ban on forced labor products.
- By December 14, 2027: The regulation takes full effect, products made with forced labor will be banned from sale in the EU, whether produced locally or imported.

This landmark legislation addresses a global human rights crisis affecting 27.6M people and sends a strong signal: products made with forced labor have no place in the EU market[2].

Forced Labor Timeline



Forced labor risk by industry prevalence

Prevalence by Industry[3]	
Total forced labor exploitation (100%)	**Risk levels**
Services 32% 5.5 M people	-
Manufacturing 18.7% 3.2 M people	Very high
Construction 16.3% 2.8 M people	High
Agriculture 12.3% 2.1 M people	Medium
Domestic work 8.2% 1.5 M people	-
Mining and quarrying 1.4% 0.2 M people	Low
Other 11.1% 1.9 M people	Medium

Category Risk Levels[4]			
Category	**Industry prevalence**	**Sector risk**	**Inherent risk levels**
Footwear, leg coverings (gaiters), related items, including parts of these products	Manufacturing (VERY HIGH)	Textiles; clothing; leather; footwear (VERY HIGH)	Very high
Fruit and nuts, edible; peel of citrus fruit or melons	Agriculture; food and forestry (MEDIUM)	Agriculture; plantations; other rural sectors (VERY HIGH)	High
Copper and articles thereof	Manufacturing (VERY HIGH)	Basic metal production (MEDIUM)	High

Key Insights

These tables compare forced labor prevalence by industry with inherent risk levels for product categories. The EU Forced Labor Regulation (FLR) adopts the definition of forced labor provided by the International Labor Organization[5].

- Manufacturing and agriculture pose the highest supply chain exposure, with risk concentrated in textiles, footwear, food, and metals.
- These sectors depend heavily on seasonal and migrant labor, heightening compliance and reputational risks.
- Procurement teams should prioritize due diligence where forced labor prevalence overlaps with critical inputs like cotton, copper, and leather.

Sectors at high risk of forced labor scrutiny

Textiles, apparel, electronics, and agriculture

Textiles and Apparel

Global cotton stocks are tightening in 2025/26, with production falling 2% while mill use remains stagnant at 118M bales. Despite higher prices, demand in textiles and apparel is flat as the sector faces growing pressure over forced labor risks in high-exposure regions such as Xinjiang, Turkmenistan, and Myanmar. Trade bans, compliance costs, and reputational concerns are dampening growth, keeping utilization rates low. This highlights how ethical sourcing challenges are constraining the global textile and apparel industry[6].

Electronics

Only 3 of 45 leading ICT companies scored above 50/100 on supply chain protections, while the average was just 20/100. The weakest areas, purchasing practices and worker rights (both 5/100), show how cost-driven “just-in-time” models heighten exploitation. With Taiwan producing 90% of advanced semiconductors, its migrant workforce faces acute risks from illegal recruitment fees and contract deception. These gaps enable forced labor and threaten global electronics supply chains[7].

Agriculture

In July 2025, a U.S. appeals court dismissed a lawsuit against major chocolate firms, showing how hard it is to trace responsibility in cocoa supply chains. Monitoring programs in Ghana and Côte d’Ivoire now cover 55% of cocoa-growing households, while the rest remain unmonitored. An investigation in Colombia found informal labor, unsafe conditions, and child labor on coffee farms, showing that certification does not guarantee fair labor practices. In sugar, the U.S. lifted its 2022 ban on Central Romana Corporation exports three months ago, though rights groups say Haitian migrant workers there still face exploitative conditions[8].

Uyghur Forced Labor Prevention Act (UFLPA)

CBP Enforcement Data

In June 2025, U.S. Customs and Border Protection (CBP) halted 549 shipments valued at more than $16.87M based on suspected use of forced labor. New high-priority products (including steel, copper, lithium, caustic soda, and red dates) highlight the need for companies to maintain audit-ready documentation that provides “clear and convincing evidence” of compliance[9].

To meet this bar, enforcement playbooks must center on three evidence trails:

- Worker-voice data
- Recruitment-fee audits
- Supplier remediation plans

Standardized Compliance Packs

Leading organizations are moving toward standardized, reusable compliance packs to cut duplicate audits and streamline reporting. Worker-voice tools are scaling globally, recruitment-fee audits are now being embedded into policies like Logitech’s, and remediation toolkits such as SAI’s MY Voice provide step-by-step closure templates[10].

At the industry level, automotive OEMs launched a Due Diligence Reporting Template (DDRT) in August 2025 to reduce supplier burden, signaling a broader push for harmonization[11].

- Companies that organize their evidence into a single UFLPA-aligned submission, combining worker feedback, fee reimbursement logs, and remediation proof, will not only speed customs clearance but also strengthen resilience across their supply chains.

EU Deforestation Regulation (EUDR)

EUDR Overview

The EUDR, effective December 30, 2024, prohibits the sale of products linked to deforestation or forest degradation after December 31, 2020, covering key commodities like soy, palm oil, cocoa, coffee, rubber, cattle, and wood. Non-compliance can result in significant penalties, including fines up to 4% of EU turnover and market bans.

Timing Details[12]

- Obligations apply from 30 December 2024 for large and medium-sized companies.
- Small and micro-enterprises have until 30 June 2025.
- Enforcement follows a 2023 adoption period, giving companies ~18 months to prepare.

Scope Requirements[13]

- Deforestation-free (no land clearing after 31 Dec 2020).
- Legally produced under origin country laws.
- Linked to a Due Diligence Statement (DDS) filed via the EU registry.
- Traceability down to plot-level geolocation (coordinates or polygons) is mandatory.

Risks & Business Impact

- Penalties: shipment rejections, market bans, fines up to 4% of EU turnover.
- Market scope: affects ~60% of EU agricultural imports, creating major exposure for food, beverage, and consumer goods supply chains.
- Supplier strain: smallholders in Africa, Brazil, and Southeast Asia risk exclusion due to limited capacity for geolocation and compliance documentation.
- Country risk benchmarking: sourcing from “standard” or “high-risk” countries requires enhanced due diligence, adding costs and complexity.

03 Critical minerals

Raw material traceability is an industry blind spot

Lack of upstream visibility a strategic risk

Compliance Gap in Mineral Industry

Minerals are emerging as the next major blind spot in supply chain compliance and resilience. While companies know their logistics partners and cloud providers, most lack visibility into the origin of critical raw material that underpin everything from EV batteries to defense systems[14].

- This upstream gap is no longer just an operational challenge; it is now a business risk at the level of labor compliance and environmental claims.

This is a wake-up call for boardrooms, as many of the sectors most exposed to volatility lie far beyond resource extraction. For example[15]:

- Electric vehicle and battery makers rely on lithium, cobalt, nickel, and rare earths.
- Consumer electronics require tantalum, tin, tungsten, and dozens of specialty metals.
- Renewable energy companies need copper, silver, and polysilicon to build solar and wind infrastructure.
- Defense contractors depend on stable access to rare earths and other strategic metals.
- Cloud and AI infrastructure leans heavily on rare earths and high-performance materials.

Critical minerals as strategic assets

Minerals are national security assets, not just commodities: U.S., China, and Australia reshape mineral access in 2025

United States: Strategic Equity in MP Materials

The U.S. Department of Defense became the largest shareholder in MP Materials, investing $400M for a 15% stake. The DoD also issued a $150M loan and guaranteed a price floor for rare earth products to secure buyers for the next decade[16].

MP will build a new U.S. factory by 2028, anchoring domestic rare earth magnet production and reducing reliance on China[17].

China: Expanding Export Controls

China extended its quota system to cover imported raw materials, raising concerns over feedstock shortages.

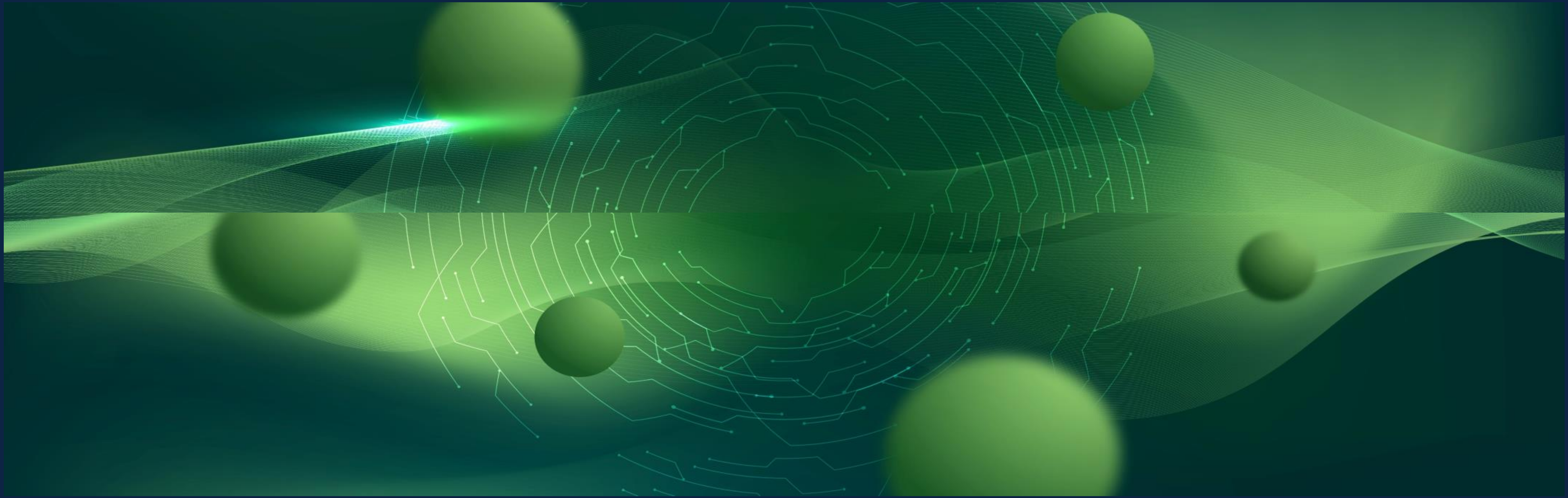
New interim rules now mandate strict licensing, quota compliance, and detailed reporting across mining, smelting, and trade. By May 2025, at least 16 key minerals and alloys were under export restrictions[18].

Enforcement has escalated, with zero-tolerance crackdowns on smuggling tied to espionage threats[19].

Allied Response: Australia as a “Superpower”

Australia announced a $1.2B strategic reserve and an additional $3.4B through its Critical Minerals Facility[20].

With over $4.6B in commitments, Australia is positioning itself as a critical mineral's superpower, strengthening allied resilience against Chinese dominance[21].



04 Greenwashing enforcement increases

Green Claims Directive (GCD) remains in limbo

Green Compliance Expectations Remain

In June 2025, the European Commission announced plans to withdraw the Green Claims Directive (GCD), citing the disproportionate burden it would place on micro-enterprises, which make up 96% of EU businesses, yet the pressure on companies hasn't eased[22].

- Regulators and consumers still expect credible, evidence-based environmental claims. And existing rules, like the Unfair Commercial Practices Directive (UCPD) and the Green Transition Directive, remain enforceable.
- Businesses must continue to audit suppliers, substantiate eco-claims, and avoid greenwashing, now without the clarity of a unified EU standard. This increases compliance costs as firms navigate inconsistent national interpretations and prepare for both legal and reputational risks.

What Companies Can do

- Substantiate All Claims: Ensure every environmental or sustainability claim is backed by evidence (LCAs, third-party certifications, supplier data).
- Audit Supplier Messaging: Review supplier marketing and product claims to prevent inconsistent or unverified "green" statements entering the chain.
- Align with Existing Rules: Treat the UCPD and the Green Transition Directive as binding. Build compliance programs now rather than waiting on the GCD.
- Prepare for Fragmentation: Monitor national laws (e.g., France, Germany, Nordics) that may advance their own green claims rules, and build a modular evidence pack adaptable across markets.
- Embed Reputation Risk Controls: Track NGO, consumer, and media scrutiny. Reputational fallout can be as costly as regulatory penalties.

Enforcement accelerates despite GCD withdrawal

"These practices, with their profusion of crossed-out prices and permanent promotions, give consumers the impression that they are getting a very good deal.

The company was unable to justify the environmental claims made on its website"

Sarah Lacoche

Directorate-General for Competition, Consumer Affairs and Fraud Control (DGCCRF)

National Authorities and Courts Move Ahead with Penalties

Even without the Green Claims Directive, enforcement is accelerating. Authorities in Italy and France are using national consumer protection and advertising laws (UCPD transpositions) to penalize vague or unsubstantiated environmental claims unless they are supported by verifiable proof[23].

- Courts and regulators are scrutinizing wording closely. Claims like “climate neutral by 2050,” “recyclable,” or “sustainable” are being challenged when they lack quantifiable evidence or contradict the company’s core business model.

Meanwhile, Member States are creating new tools: Spain’s July 2025 draft bill strengthens consumer and advertising rules to curb greenwashing, even as the GCD’s future remains uncertain[24].

- At the EU level, the UCPD continues to apply, and the Green Transition Directive will further tighten rules from 2026, particularly on neutrality and “eco-friendly” assertions.

Corporate marketing under scrutiny

Substantiation files and third-party verification

Verifying Corporate Claims

Regulators and buyers are converging on a single expectation: Every sustainability claim must be substantiated, verifiable, and audit-ready[25].

Generic claims such as “eco-friendly,” “responsible,” or “carbon neutral” are increasingly viewed as misleading unless backed by life-cycle data, third-party certifications, and clear scientific proof. Authorities stress the need for companies to maintain structured substantiation files with evidence that can withstand scrutiny at both the advertising and site level[26].

Supplier Impact

For suppliers, this is a critical compliance shift. The EU’s Green Transition Directive will prohibit unsubstantiated neutrality or eco-claims, and regulators will expect audit-ready documentation that includes LCAs, third-party verification records, and product-level data[27].

Those that cannot produce proof risk being excluded from contracts or flagged as greenwashing liabilities, while suppliers who invest early in transparent, verified, and narrowly defined claims will gain a competitive advantage in ESG-driven supply chains[28].

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05 Nature and biodiversity reporting

TNFD adoption moves beyond early adopters

More companies voluntarily disclosing risks

Taskforce on Nature-related Financial Disclosures

ISSB

SASB

CDP

Biodiversity Pushed into the Mainstream

Between June and August 2025, the Taskforce on Nature-related Financial Disclosures (TNFD) expanded beyond early adopters, launching innovation challenges and releasing new guidance to make nature-related risk reporting more accessible[29].

- The International Sustainability Standards Board (ISSB) issued a July 2025 exposure draft proposing the integration of biodiversity and ecosystem metrics into Sustainability Accounting Standards Board (SASB) standards, signaling faster regulatory alignment and standardization.
- Voluntary disclosures accelerated through the 2025 Carbon Disclosure Project (CDP) reporting cycle (June–September), driving more companies and suppliers to provide site-level biodiversity and water data aligned with TNFD frameworks.
- Meanwhile, investor pressure from groups like the Finance for Biodiversity Foundation and asset managers such as BlackRock intensified, demanding stronger biodiversity integration and greater supply chain transparency.

These developments indicate a shift toward near-mandatory ESG reporting, with procurement teams expected to deliver location-specific supplier data and manage biodiversity-related risks as critically as carbon disclosures by late 2025[30].

Nature data public facility pilots launched

Standardization and traceability goals

Nature Data Public Facility (NDPF)

New pilots are reshaping how companies measure and disclose nature impacts, with an emphasis on standardization, traceability, and supplier visibility[31].

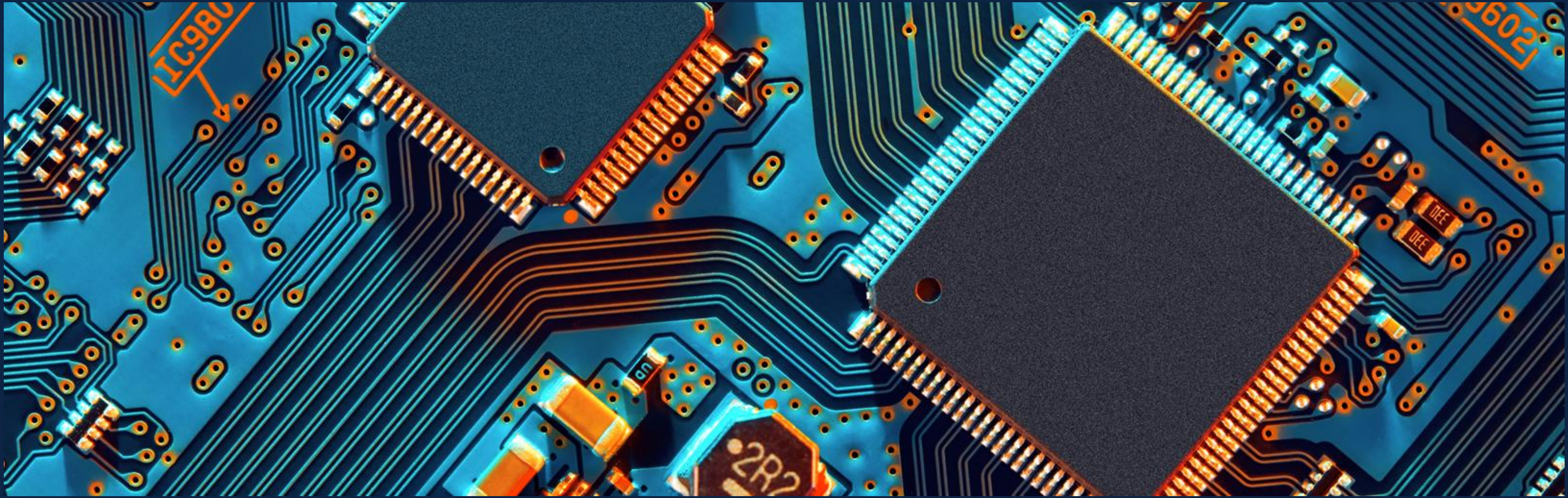
- A pilot facility backed by EU and global partners is underway to create a shared platform for standardized biodiversity metrics.
- The goal is to establish common reporting rules for land-use, biodiversity, and ecosystem impacts, reducing inconsistency across CSRD and global frameworks.
- By centralizing data, the NDPF is expected to lower compliance costs and make supplier-level disclosures more verifiable.

Corporate Technology Experiments

- Companies are trialing geospatial mapping tools and satellite monitoring to capture land-use change and deforestation risks.
- Supplier engagement pilots include requiring upstream partners to share geolocation coordinates of farms, forests, or extraction sites.
- Digital platforms and blockchain pilots are being tested to track biodiversity attributes across tiers, improving audit-readiness and traceability.

Why It Matters

- Data gap risk: Most suppliers currently lack biodiversity or geolocation data, exposing firms to non-compliance under CSRD[32].
- Technology advantage: Early movers in satellite monitoring and geospatial traceability will be better positioned for 2026 CSRD disclosures and future nature-related regulations[33].



06 Next steps

Outlook

Building a compliant supply chain

Enhanced Visibility Safeguards Against ESG & Compliance Disruptions

With ESG regulations tightening and trade restrictions accelerating, companies face heightened compliance risk if they lack visibility into multi-tier supplier networks. Rules like the UFLPA, CSRD, and forthcoming EU Green Transition Directive demand proof of origin, environmental impact data, and audit-ready documentation. A fragmented supply chain magnifies the risk of non-compliance, exposing firms to detainments, penalties, and reputational harm.

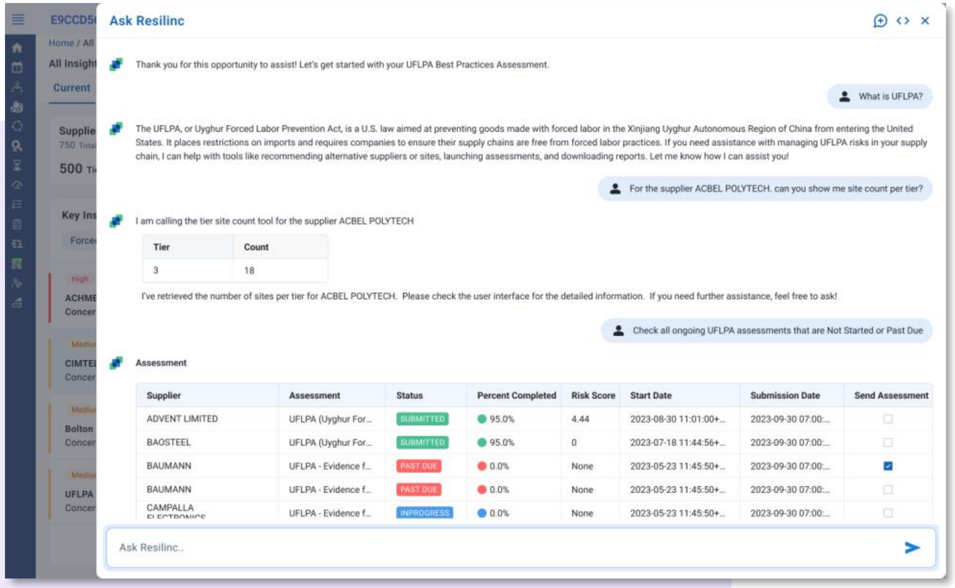
By adopting advanced mapping and analytics, organizations can detect hidden supplier dependencies, track biodiversity and labor risks, and prepare for regulatory shifts before they trigger disruption. AI-driven risk monitoring and digital traceability tools now enable real-time oversight of geopolitical, environmental, and social compliance requirements across global supply chains.

Key Strategies for Compliance Resilience

- Multi-tier supplier mapping to document ESG-sensitive inputs (e.g., cotton, critical minerals, packaging materials).
- EventWatchAI monitoring to track regulatory updates, tariff changes, and forced-labor enforcement actions.
- Supplier risk scoring and ESG resiliency analytics aligned to CSRD disclosures, UFLPA requirements, and national due diligence laws.
- Digital traceability systems to ensure chain-of-custody visibility and audit readiness.
- Scenario planning and compliance playbooks to prepare for new EU greenwashing enforcement and biodiversity reporting rules effective 2026 and beyond.

Agentic AI Risk and Compliance Suite

Make your supply chain self-healing



Risk and Compliance Agents and Solutions: Map and ensure the health of your supply base, identify and mitigate threats, and ensure compliance—before disruptions impact your operations.

- Human-like interface answers questions, proactively recommends actions, and executes on command
- Industry's most comprehensive internal and external data repository
- Partitioned knowledge graph across suppliers, sites, and parts
- Industry and use case agents for compliance and risk
- Human in the loop combined with AI Governance

Stay updated

Mitigation steps: From alert to action

1. Activate the EventWatch[AI] WarRoom

Use Resilinc's real-time alerting dashboard to:

- Identify which suppliers, products, parts, and sites are potentially impacted
- View severity, revenue risk, and regions affected – all contextualized by AI

2. Validate impact in the Resilinc mobile app

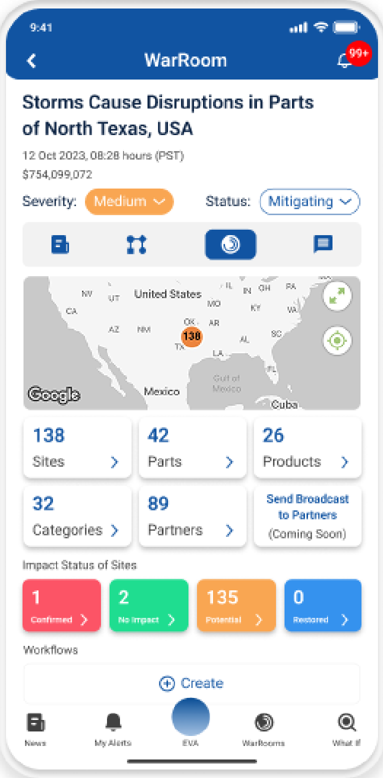
Quickly confirm disruptions and initiate response:

- View supplier-confirmed impacts and part-level risk
- Track ongoing mitigation efforts, including status of alternate source or rerouting

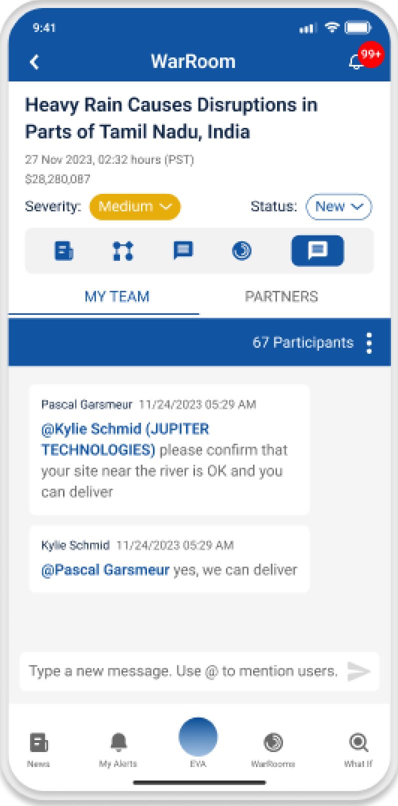
3. Collaborate in real time

Use the app and WarRoom to coordinate fast, informed decisions:

- Instantly engage commodity managers, suppliers, and internal teams
- Tap into alternate sources, available inventory, and production capacity
- Launch mitigation workflows or trigger automated supplier outreach via agentic AI



Virtual WarRoom with supplier impact confirmation



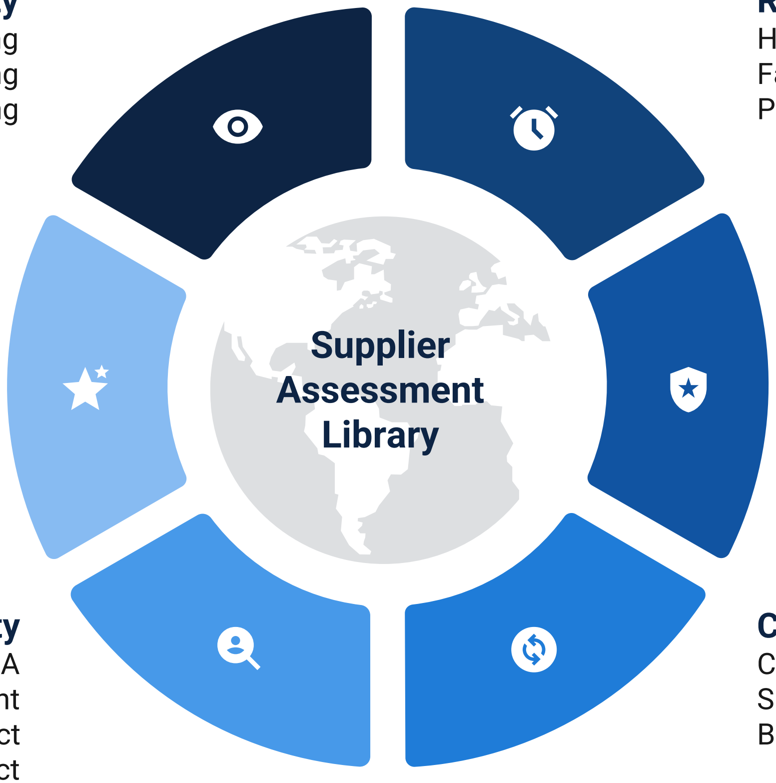
Integrated collaboration center

Resilinc supplier assessment library

All-in-one platform

Visibility
Sub-tier supply chain mapping
Part-site mapping
Material flow mapping

Readiness
Hurricane readiness
Factory fire readiness
Pandemic readiness



Reputation
Supplier ESG & sustainability
Supplier code of conduct
Supplier screening

Security
Cyber security & GDPR
Supplier C-TPAT assessment
COPE* for insurance

Continuity
REACH, RoHS, WEEE, FCPA
Brexit readiness assessment
UK modern slavery act
California supply chain transparency act

Continuity
Corporate business continuity program
Supplier site BCP assessment
Backup site & recovery time

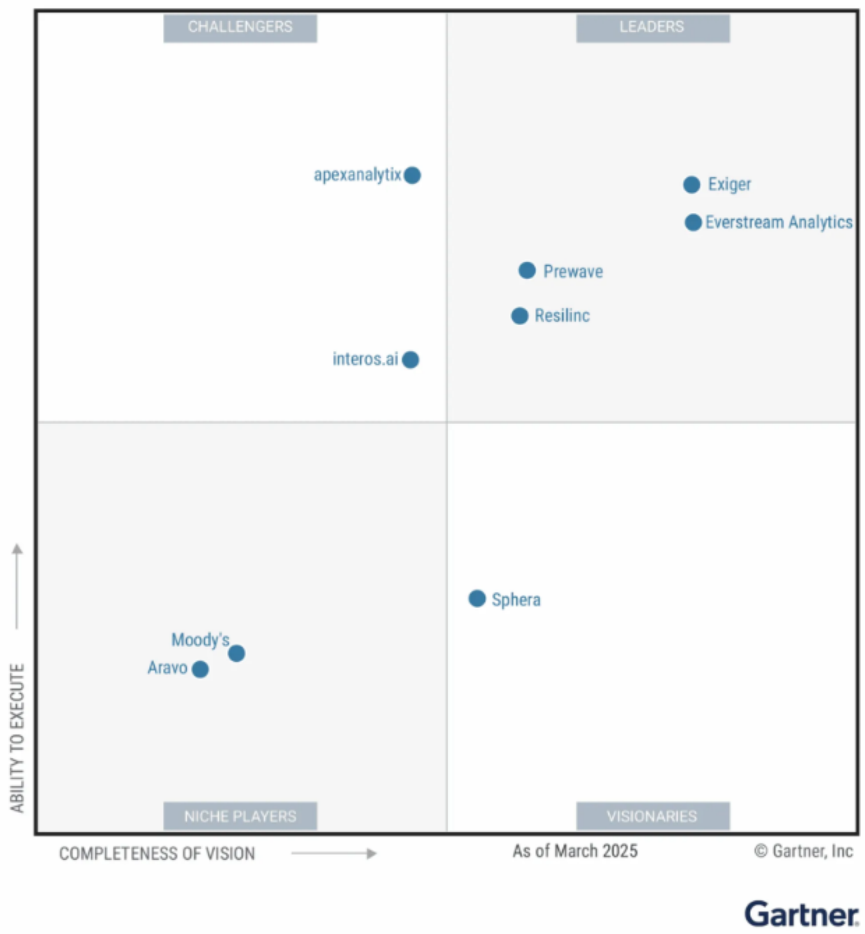
Don’t waste time creating assessments, collecting data, or compiling and analyzing response
Use our library of assessments or create your own → automatically score suppliers’ response

Resilinc recognized as a leader in inaugural Gartner® Magic Quadrant™ for Supplier Risk Management Solutions

Resilinc was acknowledged as a Leader in the 2025 Magic Quadrant™ for **Supplier Risk Management Solutions** by Gartner®. A Gartner Magic Quadrant is a culmination of research in a specific market, giving you a wide-angle view of the relative positions of the market's competitors.

We believe this recognition validates that Resilinc offers more than just a platform—we offer a competitive advantage to our customers. To us, being named a Leader by Gartner® reinforces our belief that AI-driven insights are the future of supply chain risk management.

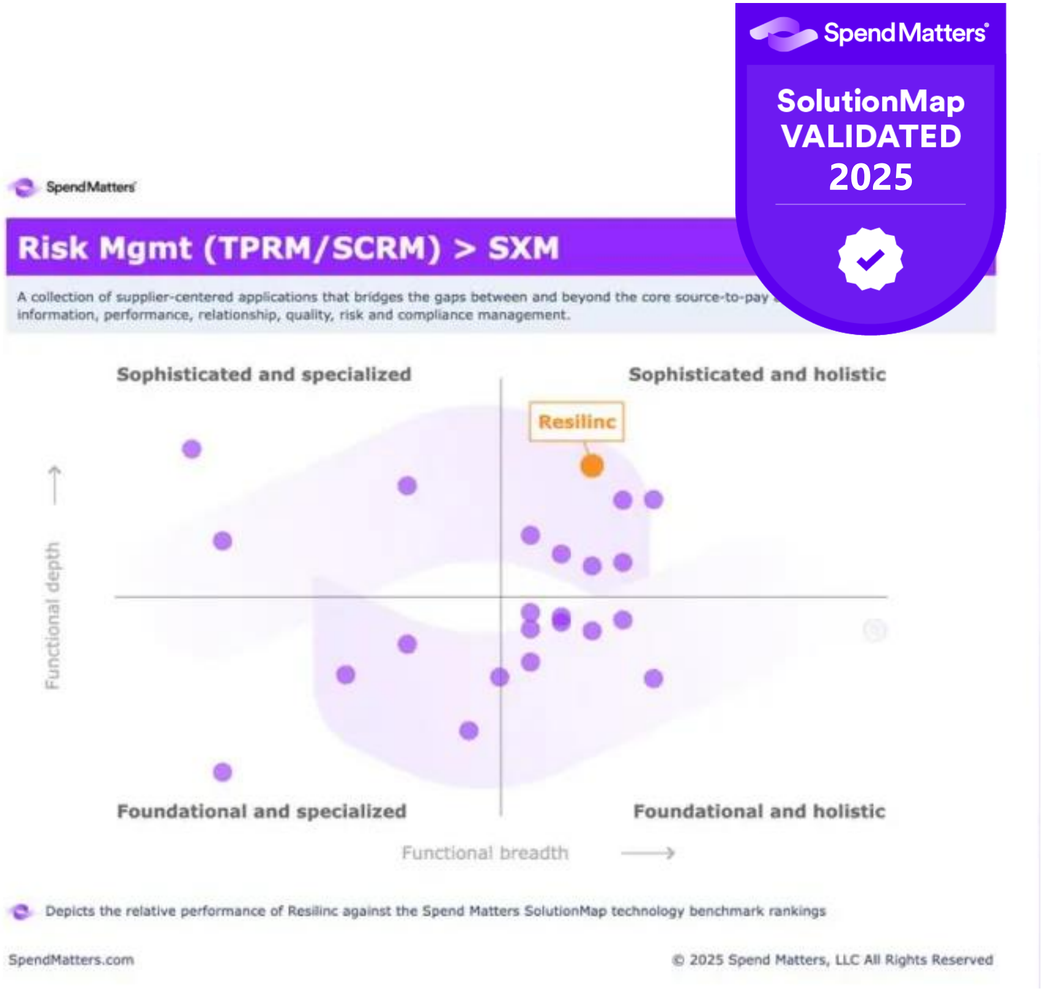
Figure 1: Magic Quadrant for Supplier Risk Management Solutions



Resilinc: Top-ranked in Spend Matters 2025 SolutionMap for Risk Management

[Resilinc scored above the benchmark](#)in Technology for **Automation and AI/ML** and **Supplier Management (SXM)**, including supplier performance and advanced SXM platform capabilities.

"Resilinc is a veritable leader in Supplier Risk Management, making it integral in managing supplier-associated risks. Its accomplishment in the modern SXM platform also stands out, reflecting its substantial capability in managing supplier relationships at diverse levels."
- Spend Matters



Do you need help navigating risk?

1. Contact your Resilinc representative or fill out the Contact Us form

2. Once contacted, someone from Resilinc will assist you within 24-hours

3. Resilinc Experts will set up a 30-minute discovery call to help you navigate the risk

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Thank you!