

CONTROLLED EXTERNAL REGULATORY SUPPLEMENT

EU FORCED LABOUR REGULATION

External Supplement Appendix

Product, Supply-Chain and Investigation Evidence Governance

v1.0 | 11 August 2026

CORE PROPOSITION A forced-labour prohibition decision is not the beginning of the evidence process. It is an authorised regulatory consequence arising from an upstream chain of product, production-site, worker-related, supply-chain, risk and investigation evidence.

A controlled external regulatory reference layer for EMJ.NEXUS. This edition governs evidence relationships relevant to Regulation (EU) 2024/3015 without amending the canonical 128 MME Mapping or transferring statutory responsibility to EMJ.LIFE.

Document Control

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Executive Statement

Regulation (EU) 2024/3015 prohibits economic operators from placing or making available on the Union market, or exporting from the Union market, products made with forced labour. The prohibition applies to products irrespective of sector, origin or stage of production and becomes applicable on 14 December 2027. Enforcement depends on authority-led preliminary assessments, investigations and decisions, supported by information that may be distributed across commercial, customs, supplier, production-site, worker, civil-society and due-diligence records.

This Appendix defines how those records may be identified, protected, related, versioned, reviewed, escalated and packaged. It does not determine whether forced labour occurred, conduct an official investigation, identify victims, or decide whether a product must be prohibited, withdrawn or disposed of.

GOVERNING PRINCIPLE Product traceability does not, by itself, prove the absence of forced labour. Evidence infrastructure must preserve the relationship between the investigated product, the part of the supply chain concerned, production locations, risk indicators, protected worker-related information, authority requests, economic-operator responses and the authorised decision.

Purpose

- Establish a controlled FLR external-regulatory reference layer for EMJ.NEXUS.
- Translate investigation and enforcement evidence dependencies into controlled tasks, Evidence Units and case records.
- Protect worker, complainant, trade-union and civil-society information through purpose-limited access and disclosure controls.
- Enable reproducible Evidence Packages for authorised enterprise response, remediation and regulatory interaction.
- Prevent platform coverage, voluntary due diligence or absence of known allegations from being represented as proof of compliance.

Institutional boundary

EMJ.LIFE and EMJ.NEXUS do not act as the European Commission, a competent authority, customs authority, market-surveillance authority, judicial body, economic operator, investigator, auditor, certifier, trade union, civil-society organisation

or victim representative merely by providing this architecture. Statutory powers and responsibilities remain with the actors designated by applicable law.

1. Authority and Non-Amendment Boundary

Layer	Source class	Function	Control
A	Regulation (EU) 2024/3015	Binding prohibition, scope, investigations, decisions, review, customs and application date.	EU law; authorities and courts.
B	Implementing acts and official systems in force	Operational forms, procedures, interoperability and system rules where adopted.	Commission within delegated authority.
C	Commission Guidelines and preparedness tools	Non-binding implementation, risk, scope, due-diligence and SME support.	Commission services; law prevails.
D	Authority and operator case evidence	Assessment, investigation, response, decision, implementation and review.	Authorised actors.
E	This External Supplement	Evidence identity, provenance, protection, relationships, state and packaging.	EMJ.LIFE system-governance boundary.

1.1 Non-amendment statement

- No change to the canonical 38-field Physical Interface or 128 MME task identities.
- No addition of FLR as a tenth core mapping framework.
- No conversion of a risk indicator into a finding of forced labour.
- No inference that voluntary due diligence is a new FLR periodic-reporting duty.
- No public disclosure of victim, complainant, worker, supplier or investigation-sensitive data by default.
- No automated prohibition, withdrawal, disposal, remediation or market-access decision.

DECISION BOUNDARY EMJ.NEXUS may support evidence formation, case integrity and authorised response. Only the competent authority or Commission, as allocated under the Regulation, may conduct the statutory assessment and issue the regulatory decision.

2. Controlled Regulatory Baseline

Source ID	Official source	Status at cut-off	Controlled use
EU-FLR-2024-3015	Regulation (EU) 2024/3015, OJ L, 12 Dec 2024	In force; applies 14 Dec 2027	Binding statutory basis.
EU-FLR-GUIDELINES-2026	EU Forced Labour Regulation Guidelines, preparedness package launched 26 Jun 2026	Official, non-binding	Scope, investigation, evidence, decisions and operator guidance.
EU-FLR-SCOPE-GUIDE-2026	Guidelines on the scope of the Forced Labour Regulation	Official, non-binding	Product, services and economic-operator clarification.
EU-FLR-DD-GUIDE-2026	Guidance for economic operators on voluntary due diligence in relation to forced labour	Official, non-binding	Possible voluntary due-diligence practices; no new statutory DD duty.
EU-FLR-PORTAL-2026	Forced Labour Single Portal	Operational information portal	Central access to resources and preparation tools.

Source ID	Official source	Status at cut-off	Controlled use
EU-FLR-RISK-TOOLS-2026	Risk database and traceability resources linked from Single Portal	Implementation support; source-specific status applies	Risk context; not proof or authority finding.
EU-FLR-SISP-2027	Single Information Submission Point	Scheduled for 14 Dec 2027	Future intake route for suspected cases; not yet operational at cut-off.
ILO-29-2014	ILO Forced Labour Convention No. 29, including 2014 Protocol context	International definition incorporated by reference in EU framework	Forced-labour definition and indicators context.

SOURCE DISCIPLINE A risk database entry, guidance example, media report, supplier statement or platform score is not an authority finding. Each source retains its type, date, provenance, limitations and legal weight.

3. Regulatory Architecture and Scope

3.1 Article 3 prohibition

Regulated event	Prohibited state	Evidence consequence
Placing on the Union market	A product made with forced labour is first supplied for distribution, consumption or use in the Union market.	Bind product, lot, actor, market event and upstream production chain.
Making available	A product made with forced labour is supplied for distribution, consumption or use in commercial activity.	Preserve transaction and direct-counterparty lineage.
Export	A product made with forced labour is exported from the Union market.	Bind product and customs/export event to investigated evidence.

3.2 Breadth and exclusions

- All products may be covered, including components and products at any stage of production, extraction, harvest or manufacture.
- The Regulation is origin-neutral and company-size neutral; prioritisation is risk-based and proportionate.
- Services are not products within the prohibition merely because they support transport, storage or logistics.
- Withdrawal of only an affected component may be permitted where the component is replaceable; perishable products and disposal require specific legal handling.
- The Regulation applies from 14 December 2027; preparedness tools do not accelerate the statutory application date.

3.3 Relationship to due diligence

The FLR establishes a product prohibition and authority-led enforcement process. It does not itself impose a general recurring due-diligence or reporting obligation. Evidence of due diligence may be considered during prioritisation, preliminary assessment, investigation, remediation and review. Voluntary due diligence can therefore improve readiness without becoming an automatic safe harbour or proof that a product was not made with forced labour.

4. Actor, Authority and Responsibility Model

Actor	Regulatory role	Evidence responsibility	Boundary
European Commission	Leads investigations where suspected forced labour occurs outside the Union and coordinates Union implementation.	Case intake, assessment, investigation, decision and information exchange.	EMJ.NEXUS cannot pre-empt Commission findings.

Actor	Regulatory role	Evidence responsibility	Boundary
National competent authority	Leads investigations where suspected forced labour occurs in a Member State and enforces decisions.	Requests, evidence review, decision, implementation and penalties.	National allocation remains authoritative.
Economic operator	Places, makes available or exports products and must comply with prohibition and decisions.	Product/supply-chain records, authority responses, implementation and remediation evidence.	Platform use does not transfer responsibility.
Customs authority	Identifies and controls products entering or leaving the Union in coordination with competent authorities.	Customs identifiers, suspension/release and control outcomes.	Customs systems remain authoritative.
Civil society / trade union / person	May provide information concerning suspected forced labour.	Source, allegation, supporting evidence and confidentiality request.	Submission is not a finding.
Worker / affected person	May be an evidence source and rights-holder requiring protection.	Consent/authority basis, testimony, harm and remediation evidence.	Do not expose identity or infer victim status automatically.

4.1 Allocation gate

1. Identify the product and regulated market event.
2. Identify the suspected forced-labour location and supply-chain stage.
3. Determine whether the Commission or a national authority is the competent lead.
4. Identify every economic operator and direct counterparty relevant to the case.
5. Record jurisdictional uncertainty as REVIEW-REQUIRED.
6. Preserve transfers between authorities without resetting case history.

5. Product, Component and Supply-Chain Identity

Object	Minimum attributes	Control objective
Product	description; CN/HS; model; SKU; batch/lot; quantity; unit; origin; market event	Define investigated population.
Component/material	component id; input material; supplier; production stage; replaceability; affected quantity	Limit or extend decision scope on evidence.
Economic operator	legal entity; official identifiers; establishment; role; contact; SME status	Bind requests and obligations to correct entity.
Supplier node	entity/site; tier; relationship; validity; supplied input; transaction	Preserve chain topology and time.
Production site	site id; address/geolocation; activity; workforce; period; owner/operator	Link risk and evidence to production reality.
Shipment/customs event	declaration; consignment; container; invoice; date; customs office	Connect case evidence to border or market action.

POPULATION CONTROL A brand, supplier or country allegation must not automatically contaminate every product. Conversely, artificial lot fragmentation must not be used to narrow a case where common evidence supports a broader affected population.

6. Forced-Labour Risk and Indicator Evidence

Evidence class	Examples	Required control
Authoritative context	ILO observations; public authority findings; sanctions or official risk material	Source identity, date, scope and legal weight.
Worker-related	testimony; recruitment fees; retention of identity documents; debt bondage; restriction of movement; threats; wage withholding	Confidentiality, consent/lawful basis, minimisation, corroboration and retaliation risk.
Site/operational	time records; payroll; contracts; recruitment records; dormitory/access controls; grievance records	Site, workforce, period, integrity and reviewer.
Supply-chain	supplier maps; purchase orders; bills of materials; traceability; audits; shipping/customs data	Product and component relationship.
Technical/analytical	traceability tools; trade analysis; laboratory or isotopic testing; remote observation	Method, uncertainty, reproducibility and limitation.
Third-party submission	civil-society, trade-union, journalist, researcher or person submission	Identity protection, allegation scope, attachments and credibility assessment.

6.1 Evidence states

State	Meaning
INDICATOR	A fact may indicate forced-labour risk; no finding.
ALLEGATION	A claim has been submitted but not determined.
CORROBORATED	Multiple sources support a fact; legal conclusion remains reserved.
CONFLICT	Material evidence is inconsistent.
PROTECTED	Access is restricted due to safety, privacy or investigation sensitivity.
AUTHORITY-FINDING	An authorised authority has made a finding within its legal competence.
SUPERSEDED	A later controlled version replaces current-use status without deleting history.

7. Worker, Complainant and Sensitive-Evidence Protection

Control	Minimum requirement	Prohibited practice
Data minimisation	Collect only information necessary for the defined case purpose.	Creating broad worker profiles unrelated to the case.
Identity separation	Use protected identity vault and pseudonymous case reference where feasible.	Publishing names or direct identifiers in DOI records.
Access	Role-, purpose- and need-to-know access with event logging.	Supplier access to confidential complainant material.
Consent / lawful basis	Record applicable basis, limitations and withdrawal consequences where relevant.	Treating consent as universally sufficient in coercive settings.
Safety	Assess retaliation, immigration, employment and physical-security risks.	Contacting a workplace in a way that exposes the source.

Control	Minimum requirement	Prohibited practice
Translation / interpretation	Record language, interpreter, method and accuracy review.	Treating machine translation as conclusive testimony.
Retention	Use case-specific legal hold, deletion and review schedules.	Indefinite uncontrolled replication.

HUMAN-RIGHTS BOUNDARY Evidence completeness must never be pursued by increasing danger to workers, complainants or affected persons. Safety, confidentiality and procedural fairness are evidence-quality controls, not optional privacy add-ons.

8. Information Submission and Preliminary Assessment

8.1 Submission intake

Field group	Minimum record
Submitter	role; protected identity reference; contact route; confidentiality request
Allegation	product; economic operator; production site; country; supply-chain stage; relevant period
Evidence	documents; testimony; media; public sources; technical analysis; provenance
Risk context	scale/severity; state-imposed risk; affected population; likelihood; uncertainty
Integrity	submission timestamp; hash; translation; duplicate/linkage; access class
Status	received; completeness review; routed; preliminary assessment; investigation; closed

8.2 Risk-based preliminary assessment

Authorities assess whether there is a substantiated concern, applying a risk-based approach that considers the scale and severity of suspected forced labour, the quantity or volume of products, the share likely made with forced labour, and the proximity or leverage of the economic operator. Information on applicable due diligence may be requested and considered. The system must preserve the criteria, information request, operator response, authority assessment and outcome as distinct records.

NO NEGATIVE PROOF Absence from a risk database, lack of a submission or completion of a social audit does not prove that forced labour is absent.

9. Investigation Evidence and Procedural Control

Stage	Controlled record	State transition
Initiation	authority; legal basis; investigated products/operators; scope; reasons; notice	PRELIMINARY-ASSESSMENT to INVESTIGATION-OPEN
Information request	questions; requested records; recipient; deadline; confidentiality class	REQUESTED
Operator response	submission manifest; source; statement; attachments; reservations	RECEIVED / INCOMPLETE / CONFLICT

Stage	Controlled record	State transition
Additional evidence	site inspection; interview; third-party evidence; expert analysis; inter-authority exchange	UNDER-REVIEW
Provisional scope	affected products/components/sites/period and rationale	SCOPE-PROVISIONAL
Finding	facts, reasoning, evidence relied upon and limitations	SUBSTANTIATED / NOT-SUBSTANTIATED
Decision	prohibition, withdrawal, disposal, component handling, remediation condition and deadline	DECISION-ISSUED
Review / challenge	request, grounds, new evidence, authority response and judicial route	REVIEW-OPEN / FINAL

9.1 Evidence Package response gate

- Every submitted record has source identity, custodian, period and product/site relationship.
- Confidential and personal data are separately classified.
- Known gaps and conflicts are disclosed rather than overwritten.
- Translations and analytical transformations preserve originals.
- The submitting person and mandate are recorded.
- The exact package version and hash are retained with receipt evidence.

10. Decision, Prohibition, Withdrawal and Disposal

Decision element	Evidence dependency	System control
Product scope	Identified product population and, where relevant, affected component.	Version-controlled population and relationship graph.
Finding	Evidence that forced labour was used at a stage of production.	Authority finding stored separately from enterprise assessment.
Prohibition	Products may not be placed/made available/exported.	Market and export HOLD linked to decision.
Withdrawal	Products already made available must be withdrawn within specified time.	Inventory, customer, channel and completion evidence.
Disposal	Product handled in accordance with decision and applicable waste hierarchy/specific rules.	Method, quantity, operator, date and proof.
Replaceable component	Affected component may be removed/replaced where legal conditions are met.	Bill-of-materials, segregation, replacement and verification evidence.
Remediation	Economic operator may provide evidence that forced labour has been eliminated.	Corrective-action and outcome evidence; no automatic lifting.
Review	Authority may review decision on request and supporting new information.	Immutable original decision plus review versions.

11. Customs, Market Surveillance and Cross-Authority Evidence

Interface	Minimum data	Boundary
Authority-to-customs	decision reference; product identifiers; CN code; operator; affected period; status	Authority source remains controlling.
Customs control	declaration/consignment; match criteria; suspension/release; inspection; outcome	No platform-generated customs release.

Interface	Minimum data	Boundary
Market surveillance	inventory/channel; withdrawal request; response; completion; residual stock	National powers remain controlling.
Union Network	case coordination; competence transfer; consistent application; lessons	Share only authorised data.
ICSMS or successor interface	case/status information permitted under governing rules	External system remains authoritative.
Public decision record	non-confidential decision information required for publication	Protected evidence excluded.

12. 128 MME Application and Framework Boundary

Framework	Permitted contextual contribution	Boundary
ISSB S1/S2	Entity governance, risk and value-chain process context.	Disclosure does not decide FLR cases.
SASB/SICS	Industry and value-chain routing.	Industry relevance is not proof.
GRI	Human-rights, labour and impact-management context.	Reporting is not investigation evidence by itself.
ESRS	Value-chain, affected-workers, due-diligence and incident context.	ESRS disclosure does not create an FLR safe harbour.
TNFD	Location and dependency context where relevant.	Nature analysis does not resolve labour facts.
TISFD	Inequality, rights-holder and worker/community context.	Social mapping does not identify a victim or finding.
COSO	Control environment, risk, information, monitoring and remediation.	Control maturity is not certification.
Scope 3	Supplier and activity-data relationships.	Emissions evidence is not labour evidence.
SDGs	SDG 8 and impact context.	SDG contribution is not a legal defence.

12.1 Enterprise workflow

Stage	128 MME-enabled activity	FLR extension	Result
Intake	Assign actor, task, time and Evidence Unit.	Product, allegation, site and protected-source record.	CASE-INTAKE
Risk	Route supply-chain and social evidence.	Indicators, severity, scale and uncertainty.	RISK-CONTEXT
Response	Route document requests and approvals.	Authority request and operator Evidence Package.	RESPONSE-SUBMITTED
Investigation	Route evidence review and conflict tasks.	Case scope, findings and procedural history.	CASE-STATE
Decision	Route authorised restrictions and actions.	Prohibition, withdrawal, disposal or component action.	DECISION-LINKED
Remediation	Route corrective actions and verification evidence.	Worker-centred remediation and product consequence.	REVIEW-READY
Continuity	Route new information and source changes.	Reopen, review, supersession and retention.	CURRENT / SUPERSEDED

13. Logical Control Extension Schema

These are logical application controls, not new columns in the canonical 38-field Physical Interface.

Logical group	Illustrative attributes	Function
source_identity	instrument; provision; legal_status; version; locator; hash; access_date	Authority and provenance.
case_identity	case_id; lead_authority; jurisdiction; opened_at; status; confidentiality	Case control.
product_identity	product; CN_HS; model; lot; component; quantity; event	Investigated population.
supply_chain	operator; supplier; site; tier; input/output; validity; transaction	Chain linkage.
person_protection	protected_person_id; role; lawful_basis; consent_limits; safety_class	Sensitive evidence protection.
risk_indicator	indicator; source; site; period; severity; scale; uncertainty	Risk context without finding.
investigation	request; response; evidence; reviewer; deadline; finding	Procedural lineage.
decision	authority; scope; measure; deadline; review; public_status	Regulatory consequence.
remediation	harm; action; responsible_actor; worker_input; outcome; verification	Remediation evidence.
continuity	new_information; reopened_at; superseded_by; retention; legal_hold	History and monitoring.

13.1 Controlled null and exception states

State	Meaning
NOT-ASSESSED	No assessment performed.
NOT-DETERMINED	No authorised conclusion reached.
CONTEXT-ONLY	Source provides context, not a finding.
EVIDENCE-GAP	Required information is unavailable or unlinked.
CONFLICT	Material sources disagree.
PROTECTED	Access restricted for safety, privacy or investigation integrity.
REVIEW-REQUIRED	Authorised legal, human-rights, customs or compliance review required.
HOLD	Market, export or response action blocked.
CURRENT	Record passed defined review under current sources.
SUPERSEDED	Later controlled version replaces current-use state.
REOPENED	New information requires reassessment.

14. Controlled Evidence Package and DOI Landing Page

Component	Minimum content
Manifest	Package id/version; case/product population; creator; approver; hash; confidentiality.

Component	Minimum content
Regulatory basis	Instrument, provision, source status and effective date.
Identity graph	Operators, suppliers, sites, products, components, lots and market/customs events.
Protected-source index	Pseudonymous source reference, protection class, custodian and access rule.
Risk package	Indicators, sources, scale/severity, uncertainty and due-diligence context.
Investigation package	Requests, responses, evidence, conflicts, deadlines and receipts.
Decision package	Authority decision, scope, measure, deadlines, review and implementation.
Remediation package	Actions, affected-person input, outcome and review evidence.
Continuity package	New information, reopenings, versions, legal holds and retention.
Limitations	Known gaps, third-party dependencies and prohibited inferences.

14.1 Public DOI Landing Page

The public page may disclose only authorised, non-confidential provenance and publication status: document title/version, regulatory basis, covered period, last review date and current/superseded status. It must not expose worker or complainant identity, allegations, exact sites, supplier identities, authority communications, customs controls, protected risk intelligence or remediation details unless publication is legally required and authorised.

APPROVED LANGUAGE FLR-related evidence has been structured, versioned, protected, linked and reviewed through the EMJ.NEXUS evidence-infrastructure architecture for authorised use. This status is not legal advice, certification, assurance, regulatory approval or a determination that forced labour is present or absent.

15. Change, Monitoring and Release Control

Trigger	Required action
New or amended EU measure	Register legal effect, dates and official source; perform impact assessment.
Guideline or portal update	Register as non-binding; assess operational effect; preserve prior version.
Risk database change	Version the source; identify affected cases; do not convert into finding.
Single Information Submission Point launch/change	Version form, fields, access, receipt and privacy controls.
New allegation or worker information	Protect source; scope affected products/sites; assess retaliation risk; route appropriately.
Authority request/decision	Preserve exact request, deadline, response, receipt, decision and review status.
Supplier/site/product change	Revalidate chain identity and affected population.
Evidence conflict or expiry	Mark conflict/stale state; prevent inappropriate reuse; escalate.
Remediation evidence	Record action and outcome; await authorised review before lifting consequence.

15.1 Release gates

- Binding and non-binding sources are visibly distinguished.

- The applicable date of 14 December 2027 is stated correctly.
- No voluntary due-diligence guidance is represented as a new statutory reporting obligation.
- Every case object has product, actor, site, time and source provenance where available.
- Worker and complainant data pass safety, privacy and access review.
- Allegations, indicators, enterprise assessments and authority findings are separate states.
- Authority requests and responses are versioned and reproducible.
- No platform score or framework mapping is presented as proof of absence or presence of forced labour.
- No External Supplement series number is inserted.
- No endorsement by any EU institution, authority, ILO or civil-society organisation is implied.

16. Implementation Decision and Release Plan

Priority	Implementation	Acceptance condition
P0	Register the legal baseline, 2026 guidelines and tool status.	Every source has authority class, version, date and locator.
P0	Implement case, product, component, operator, supplier and site identities.	Investigated population is reproducible.
P0	Implement protected-person and confidential-source controls.	No sensitive record is publicly or improperly exposed.
P1	Implement allegation, indicator, preliminary-assessment, request and response workflows.	States and responsible authority are distinct.
P1	Implement investigation, decision, withdrawal, disposal and review records.	Authority decision remains immutable and linked to implementation.
P1	Generate protected FLR Evidence Packages and limited DOI records.	Package is hashable; public layer excludes protected data.
P2	Integrate portal/submission-point and authority interfaces when operational specifications permit.	External-system responses reconcile without replacing authority records.
P2	Run POCs for a component-based product and a multi-tier labour-intensive product.	End-to-end scope, protection, conflict and remediation controls pass review.

FINAL ARCHITECTURE DECISION FLR is governed as a version-controlled External Regulatory Reference Layer and case-management use case. It is not added as a tenth core framework and does not reconstruct the canonical 128 MME Mapping.

Appendix A. Requirement-to-Evidence Crosswalk

FLR reference	Requirement / object	Controlled evidence	EMJ.NEXUS function	Boundary
Arts. 1-3	Scope and prohibition	Product, operator, market/export event and production-chain evidence	Population and event linkage.	No compliance finding.
Arts. 4-7	Authorities and Union Network	Competence, transfer, cooperation and case status	Authority and case identity.	No authority substitution.
Arts. 8-9	Submission and preliminary assessment	Allegation, source, risk criteria, operator due-diligence information	Protected intake and assessment lineage.	Submission is not proof.
Arts. 10-13	Investigation and information	Notice, requests, evidence, inspection and response	Case workflow and Evidence Package.	No investigative power.

FLR reference	Requirement / object	Controlled evidence	EMJ.NEXUS function	Boundary
Arts. 14-18	Decisions, review and recognition	Finding, product scope, measure, review and cross-border effect	Decision and version control.	Authority record controls.
Arts. 19-21	Implementation and penalties	Withdrawal, disposal, remediation, compliance and national penalties	Action and outcome evidence.	No penalty determination.
Arts. 22-24	Customs controls	Decision identifiers, product/customs matching and release/hold	Customs case linkage.	Customs system controls.
Arts. 25-27	Disposal, database and portal	Disposal method, risk sources and portal/submission status	Source/version and action governance.	Risk data is not finding.
Arts. 28-31	Guidelines, information systems, data and confidentiality	Guidance, case exchange, access and protected data	Authority classification and access control.	No public disclosure by default.
Art. 39	Application	14 December 2027	Temporal applicability gate.	No accelerated legal effect.

Appendix B. Minimum FLR Evidence Record

Domain	Required record
Control	record_id; version; state; owner; reviewer; created_at; updated_at
Source	source_id; authority class; provision; legal status; locator; hash; access date
Case	case_id; lead authority; jurisdiction; confidentiality; scope; status; deadlines
Actor	entity_id; official identifiers; role; establishment; contact; mandate
Product	description; CN/HS; model; lot; component; quantity; unit; market/export event
Supply chain	supplier; site; tier; input/output; relationship validity; transaction
Person protection	protected id; role; lawful basis; consent limit; safety and access class
Risk / allegation	indicator; allegation; source; site; period; scale; severity; uncertainty
Investigation	notice; request; response; evidence; receipt; conflict; reviewer; finding
Decision	authority; scope; measure; issue date; deadline; review; public status
Implementation	withdrawal; disposal; component replacement; customs/market action; proof
Remediation	harm; action; worker input; outcome; verification; authority review
Continuity	new information; reopened; superseded; legal hold; retention

Appendix C. Evidence Conflict and Escalation Protocol

7. Register the conflict without overwriting either source.
8. Identify every product, component, site, transaction, case response and decision dependent on the disputed evidence.

- 9. Classify impact as contextual, assessment-relevant, investigation-relevant, decision-critical or safety-critical.
- 10. Apply PROTECTED, REVIEW-REQUIRED or HOLD as appropriate.
- 11. Assess retaliation and source-safety risk before seeking clarification.
- 12. Request additional evidence through an authorised and controlled channel.
- 13. Route legal, labour-rights, customs, privacy, safeguarding or technical issues to qualified reviewers.
- 14. Record resolution rationale, residual uncertainty and responsible decision-maker.
- 15. Issue a new Evidence Package version and preserve superseded history.
- 16. Notify authorities or affected business partners only where legally required and authorised.

Appendix D. Cryptographic Source Manifest

This v1.0 publication registers official locators and source status. Byte-level hashes must be inserted after controlled acquisition. A locator alone is not a byte lock.

Source ID	Official locator	Byte-lock state
EU-FLR-2024-3015	http://data.europa.eu/eli/reg/2024/3015/oj	ACQUISITION / HASH REQUIRED
EU-FLR-PORTAL-2026	https://single-market-economy.ec.europa.eu/single-market/goods/forced-labour-regulation_en	WEB CAPTURE / HASH REQUIRED
EU-FLR-GUIDELINES-2026	https://single-market-economy.ec.europa.eu/document/download/41642959-ab02-4bc9-8cb2-e6aae9024203_en	NON-BINDING / HASH REQUIRED
EU-FLR-SCOPE-GUIDE-2026	Official scope-guidelines file linked from the Single Portal	NON-BINDING / HASH REQUIRED
EU-FLR-DD-GUIDE-2026	Official voluntary due-diligence guidance linked from the Single Portal	NON-BINDING / HASH REQUIRED
ILO-29	https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100	EXTERNAL AUTHORITATIVE SOURCE / HASH REQUIRED

Appendix E. Standard Insertion and Citation Language

E.1 Core-document reference

APPROVED LANGUAGE EU Forced Labour Regulation materials are controlled through EMJ.LIFE EU Forced Labour Regulation Product, Supply-Chain and Investigation Evidence Governance External Supplement Appendix v1.0 (EMJ-EXT-EU-FLR-2026-APPX). They support source provenance, product and supply-chain identity, protected worker-related evidence, investigation-response lineage, regulatory-decision records and continuing-evidence governance. They do not amend the canonical EMJ.NEXUS architecture or determine whether forced labour is present or absent.

E.2 Task-note language

APPROVED LANGUAGE FLR content, if used, is recorded as an external regulatory use case linked to the relevant canonical task and Evidence Unit. Canonical framework routing, points, value factors, weights, RCF, MCP, AEU, NTCC, Evidence Tier, assurance and claims conclusions remain unchanged.

E.3 Disclaimer

APPROVED LANGUAGE This supplement does not replace Regulation (EU) 2024/3015, implementing measures, competent authorities, customs authorities, courts, professional legal or human-rights advice, or worker-centred safeguarding. Inclusion within EMJ.NEXUS does not imply endorsement, certification, approval or recognition by the European Commission, any EU institution, the ILO or any other organisation.

Document Control and Disclaimer

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