



GUIDANCE FOR RESPONSIBLE SOURCING IN CONFLICT ZONES RECOMMENDATIONS / BEST PRACTICES FOR BUYERS

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Introduction

The American Apparel & Footwear Association (AAFA) and Worldwide Responsible Accredited Production (WRAP), AAFA's Official CSR Partner, have periodically issued joint publications providing guidance on responsible sourcing practices, including on supply chain challenges like [forced labor](#), [assessing social compliance of new suppliers](#), [in-factory social compliance guidance for non-CSR personnel](#), [excessive working hours](#), and [responsible sourcing in tariff-impacted supply chains](#).

Responsible sourcing is increasingly critical amid rising instability in today's fast-evolving geopolitical climate. Brands may unknowingly contribute to the financing of armed militias or human rights violations if supply chains in conflict zones are not thoroughly reviewed.

This situation presents significant challenges to buyers who have built a framework around ethical principles and consumers who want to support their ethical practices. To reduce the risk of conflict-related behavior down the supply chain, buyers and suppliers should stay informed and take action by following the best practices included in this guidance.

Responsible sourcing in conflict zones is challenging due to a variety of reasons, such as government/military intervention, land disputes, transit of workers, transit of materials and finished product, armed militia funding, imposed sanctions, unstable energy prices, mass migration, and exploitation. Weak governance and lack of enforcement exacerbate these issues, making workers vulnerable to excessive overtime, underpaid/unpaid labor, and dangerous working conditions.

The questions and recommendations outlined in this guidance are designed to help companies assess potential impacts of conflicts on suppliers, workers, and production timelines before making abrupt decisions. In the face of an ever-changing geopolitical climate, the industry's commitment to ethical sourcing must remain consistent. By using this framework, buyers can reduce risk, uphold their responsibilities to supplier partners and workers, and reinforce the shared values that define AAFA and WRAP's approach to responsible supply chain management.

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Assessing Conflict

Risk Assessment

To prevent or reduce these risks, AAFA recommends creating a risk assessment that identifies risk-related behavior to assess the scale of conflict and its impact on sourcing.

Country/Regional level risk screening criteria should include answers to the following:

- What is the intensity of armed conflict in the country/region?
- Is there risk of drone/air strikes in the country/region?
- How much control does the government/military have over industry?
- Are there international sanctions on the country/region?
- Are there forced/child labor risks in the country/region?
- Are there trade embargoes against the country/region?
- Are there restrictions on movement – workers/materials/product – in the country/region?
- Are local authorities taking initiative to reduce conflict in the country/region?

Regional conditions surrounding a factory may increase the likelihood of unethical sourcing. When assessing the risk of conflict impact, buyers should consider the following questions if sourcing from high-risk areas:

- How close are factory operations to active conflict zones?
- Are factories/warehouses/ports vulnerable to drone/air strikes?
- Are there military checkpoints near factories/warehouses/ports?
- Are there large populations of internally displaced people or refugees near sourcing sites?
- Are displaced people legally protected?
- How effective is law enforcement in the region?
- Are local authorities willing to inspect facilities and investigate compliance risks?

Factory level risk screening criteria should include answers to the following:

- Is worker safety at risk due to the conflict?
- Would continuing operations contribute to violence or unethical labor practices?
- Is the factory certified by a third-party independent certification program, like WRAP?
- Is the factory owned or partially owned by a state-owned company?
- Are any of the owners or board members currently or formerly affiliated with the government/military?
- Are any owners or directors listed on an international sanctions list?
- Does the facility receive government or military funding, or have any other nexus with the government or military?

Buyers are responsible for investigating further and acting at their best judgement depending on the answers to the above questions.

Transit Routes

Countries/regions experiencing political turmoil and sanctions often rely on alternative transit routes. These routes typically involve sanction evasion to continue factory operations, undermining legal compliance. It is important to make note of unusual shipping routes, as this may be a risk indicator. To ensure responsible sourcing in sanctioned areas, buyers should:

- Regularly review sanctions lists published by the European Union (EU) and the U.S. government.
- Flag high risk waterways or ports
- Ask suppliers for the ports used to ship raw materials and finished goods.
- Train suppliers on sanctions compliance.
- Track vessel routes on websites such as MarineTraffic.com and make note of unusual activity – Watch for red flags and sudden changes in location.
- Develop alternative sourcing routes for high-risk areas.

Port closures and restrictions are common in conflict-zones and may affect factory operations. Buyers should take into consideration:

- Longer travel time;
- Increased fuel costs;
- Delays in delivery time; and
- Higher shipping costs.

Responsible Engagement

If after the risk screening, a buyer believes that they can safely continue factory operations, then consider asking the following questions:

- Are local ports restricted by militias/government officials?
- Are workers paid full regular wages, including overtime hours?
- Are workers working excessive overtime hours?
- Is there any risk of conflict affecting factory operations in the future?
- Do workers have proper access to clean water, food, shelter, and medical assistance?
- Is it safe for your own personnel to travel to/from the site?
- What are local authorities doing to mitigate risk-related behavior?

Buyers should stay connected on ground and check up on factory operations to ensure compliance and to uphold ethical production. Consider the following best practices:

- Regularly track the geopolitical climate in case of conflict escalation.
- Strengthen worker grievance mechanisms.
- Frequently conduct active, ongoing screenings and audits (e.g., 2 to 3 times a year).
- Require suppliers to incorporate training programs to expose workers to conflict-related behavior and to implement an evacuation plan in case of emergency.
- Temporarily adjust worker wage based on inflation and local cost-of-living.
- Develop relations on ground with local NGOs and stakeholders to gain additional insight into the conflict and its impact on workers/suppliers.
- Coordinate with NGOs/IGOs to advocate for safe passage of goods and to ensure workers have proper access to food, water, and shelter.
- Advise local authorities to correct any issues.

In case of emergency, suppliers should provide workers with assistance and implement safety protocols. Take into consideration the following:

- Addressing missile/airstrikes;
- Implementing evacuation drills;
- Providing adequate supply of food and water;
- Ensuring safety of workers when inside the facility;
- Providing safe transit to/from work;
- Providing physical/mental health support; and
- Contacting relevant stakeholders to help mitigate any issues.

Responsible Disengagement

Worker Impact

Disengaging from an enterprise should be the last resort for buyers. However, if, after the risk screen, a buyer determines it is too high of a risk to continue sourcing from a factory/region/country, then a buyer should slowly disengage to avoid risk of unethical labor practices and legal implications. When responsibly disengaging from a factory, a buyer should take into consideration the following questions regarding worker's impact:

- What will happen to the workers if a buyer disengages?
- Are workers lives at risk due to the conflict?
- Will workers lose money, housing, or legal status?
- Do workers rely on suppliers for housing and food?
- Are unemployed persons protected under local laws?
- Can the supplier make required severance payments to workers in full and in a timely manner?
- Are the remaining workers paid their full regular wages, including overtime hours?
- Is there a grievance mechanism that remains active after disengagement?
- Are local authorities capable of correcting the issues or providing assistance to the workers?

Legal Impact

Legal obligations may hinder the disengagement process. Buyers should address the following questions before considering a disengagement plan:

- Do you have any contracts in place?
- Were they negotiated or one-sided and accepted by supplier as issued?
- Even if contracts were negotiated, were extra-contractual requests/requirements placed on the supplier like buying and holding long lead supplies to improve delivery time?
- Was the supplier asked to place firm long orders for supplies, and will it be stuck with those commitments when you exit?
- What is the likelihood of a supplier litigating order cancellation against the contract or local law?

Responsible Exit Strategy

An immediate exit from an entity may cause mass layoffs, increase exposure of workers to the conflict, or push suppliers towards less responsible buyers. Suppliers may also be forced to rely on militia groups to gain profit. To responsibly disengage from a factory or other entities, buyers should create a strategically curated disengagement plan that encourages cooperation and responsible sourcing for future stakeholders. Follow these best practices:

- Communicate with the supplier or subcontractor your reasoning for disengagement.
- Emphasize the importance of ethical production and complying with local labor laws.
- Gradually reduce order volumes within a specific timeframe (e.g., 3 to 6 months), starting from 5-10 percent reduction of quantity. Adjust the pace if hard to workers, or risk, increases.
- Ensure workers receive full payments despite production reduction.
- Pay in full for all complete orders, work-in-progress, and raw materials previously purchased in a timely manner.
- Require a worker protection plan encompassing safety, wages, and severance.
- Ensure workers receive their full payment and severance before exit.
- Communicate with other buyers sourcing from the same supplier or subcontractor and share risk findings.
- Engage local authorities to take initiative on the matter.
- Work with local NGOs/IGOs such as the United Nations to closely monitor the conflict and its impact on workers.

Refer to [AAFA's sourcing profiles](#) if buyers wish to source elsewhere.

Conclusion

The questions and recommendations outlined in this guidance are designed to help buyers and suppliers navigate responsible sourcing in conflict zones. Conflict has a major impact not only on a brand's business efforts, but on the workers working living in unsafe conditions. By using this framework, buyers and suppliers can reduce risk, uphold their mutual responsibilities, and mitigate worker impacts, thereby reinforcing the shared values that define AAFA and WRAP's approach to responsible supply chain management.

AAFA Core Values Statement

AAFA members have agreed to the following statement as part of membership: To further promote positive impact through our practices, we commit to continuous improvement with accountability in:

1. Upholding legal, safe, and responsible workplace conditions for the workers in our supply chains;
2. Honoring fully the commitments we make to our supply chain partners;
3. Designing, manufacturing, and selling only safe, responsibly made, and authentic products; and
4. Adopting and implementing sustainable practices to support effective environmental stewardship efforts.

We further commit to using independent, credible, and verifiable means and advocating smart and innovative policies in pursuit of these goals that affect our people, partners, products, and planet.

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