

RBA Validated Assessment Program (VAP) Operations Manual

Revision 7.0.0 – January 2021

Organizations working with and in the Responsible Business Alliance (RBA) www.responsiblebusiness.org are working to improve sustainability and social responsibility within the global supply chain.

These companies recognize a mutual responsibility to ensure working conditions are safe, workers are treated with respect and dignity, and that manufacturing practices are environmentally responsible. The Validated Assessment Program (VAP) is a collaborative approach to auditing to reduce the burden on supply chain companies from multiple requests for social audits. The VAP meets the need for a high quality, consistent and cost-effective standard industry assessment for labor, ethics, health, safety environmental, and management systems practices based on the RBA code of conduct, laws, and regulations.

For more information about the Validated Assessment Program (VAP), please contact:

- RBA Email: vap@responsiblebusiness.org
- RBA Address: 1725 Duke Street, Suite 300, Alexandria VA 22314, USA
- RBA Website: www.responsiblebusiness.org

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APPENDIX 10 CODE INTERPRETATION GUIDANCE

1. GENERAL NOTES

This Appendix outlines requirements or AC for site observation, document review, management knowledge and understanding and worker awareness and understanding for each of the RBA Code provisions as described in the most current VAP OM. These are termed Conformance Requirements in this Appendix. All of the Conformance Requirements must be met for the Auditors to conclude Conformance for that AC.

The appendix provides also additional clarification, definitions, details and examples. These are termed Additional Assistance. Additional assistance is guidance and assistance to the Conformance Requirements but do not form in themselves a requirement of conformance.

Additionally, this Appendix provides guidance for rating non-conformance for each of the AC.

The following notes apply for all provisions herein:

- When there is a discrepancy between the RBA code, local law, a participant's policies or a Collective Bargaining Agreement, the RBA defines conformance to the RBA code as meeting the strictest requirements (even if it meets RBA code provisions and legal requirements). A Collective Bargaining Agreement may create requirements beyond the RBA Code requirements. The VA will not validate CBA compliance where it is stricter than the RBA Code.
- A legal non-conformance is a Major non-conformance unless otherwise stated in a specific provision (e.g. A3.1 if situation of Auditee is below 60h/w but above local law for $\leq 40\%$ of the workers) or there is another finding which has a higher non-conformance rating for that provision.
- For the purpose of rating, an element is defined as any listed Conformance Requirement.
- All communications from Auditee to workers must be done in a language the worker can understand unless otherwise stated in the provisions. If this is not the case, then the relevant aspect is at minimum a 'Major' non-conformance.
- All AC apply to all workers, including temporary, migrant, student and contract, directly and indirectly employed workers that work in the factory/on production/in warehouse and any other type of worker/employee unless the AC specifically states a narrower focus group.
- Unless otherwise noted, references to percentage of workers in conformance or non-conformance are based upon the defined sample.
- A Process is not required to be in writing as per ISO (unless the AC states specifically it must be documented), however all processes must be verifiably implemented in a consistent way
- "Supplier" in this section shall mean "Next Tier Major Supplier". This is different to 'supplier' which can be any supplier to the facility.

2. A. LABOR

A1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor; involuntary or exploitative prison labor; slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities including if applicable, workers' dormitories or living quarters. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers and agents may not hold or otherwise destroy or conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers', agents' or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

A1.1 Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted

Conformance Requirements:

Site Observations	Record Review
Not applicable	1) <u>Voluntary work</u> a) Personnel files and working hour record/wages do not show any form of non-voluntary labor b) <u>Grievance records do not show any allegation that overtime is not voluntary.</u> 2) <u>Fees</u> a) All Fees and penalties are disclosed to the workers. b) Records on Fees are maintained and disclosed to the worker c) Fees are not permitted under any circumstances. d) Any Fees are required to be returned to the worker within 90 days of discovery. 3) <u>Loans</u> a) Personal loans have a repayment maximum of 10 percent of the worker’s monthly gross base wage, (no interest permitted), for no more than 6 monthly installments. b) Education loan repayments do not exceed 10% of one year of gross base wages. Any education loan cannot be longer than 1 year per loan.

Additional assistance:

Site Observations	Record Review
Not applicable	1) <u>Voluntary work</u> a) examples of non-voluntary work: Lack of workers’ consent to work, unlawful retention of wages or benefits, work through any form of servitude (e.g. negotiation of visa, housing, work in exchange for training), security guards (armed or unarmed) keep workforce under retention b) Non-voluntary overtime such as no right for a worker to refuse overtime 2) <u>Fees</u> a) Payroll, wage and other records reviewed show no prohibited fees, excessive fees, significant debt, and/or significant loans except those acceptable fees listed in Appendix 13 3) Fees are defined in Appendix 13. If a fee is not specifically listed in Appendix 13 or does not fit any of the example categories, foreign migrant workers shall not be required to pay anything that a ‘Local worker would not be required to pay.

Rating:

Scenario 1 - Prohibited recruitment and hiring fees that were paid and not reimbursed within 90 days, or as soon as practicable upon discovery.

Frequency \ Severity in monthly gross base wages	0-5%* (<1-month gross base salary)	>5%-100%* (<1-month gross base salary)	100-150%* (> 1 month - 1.5-month gross base salary)	>150%* (>1 -1.5-month gross base salary)
≤1% or 3 workers or fewer (whichever is greater)	Minor	Minor	Major	Priority
>1%-5% or more than 3 workers but less than 7 workers	Major	Major	Major	Priority
>5%-40% or more than 7 workers	Major	Major	Priority	Priority
>40%	Major	Priority	Priority	Priority
*total of all fees charged during recruitment and employment				

Guidance for auditors: The first column is the addition, and the percentage to evaluate the second column has now changed. Note that “of all fees charged during recruitment and employment” means that auditors should add the fees, and not consider each one individually for the purposes of the table rating

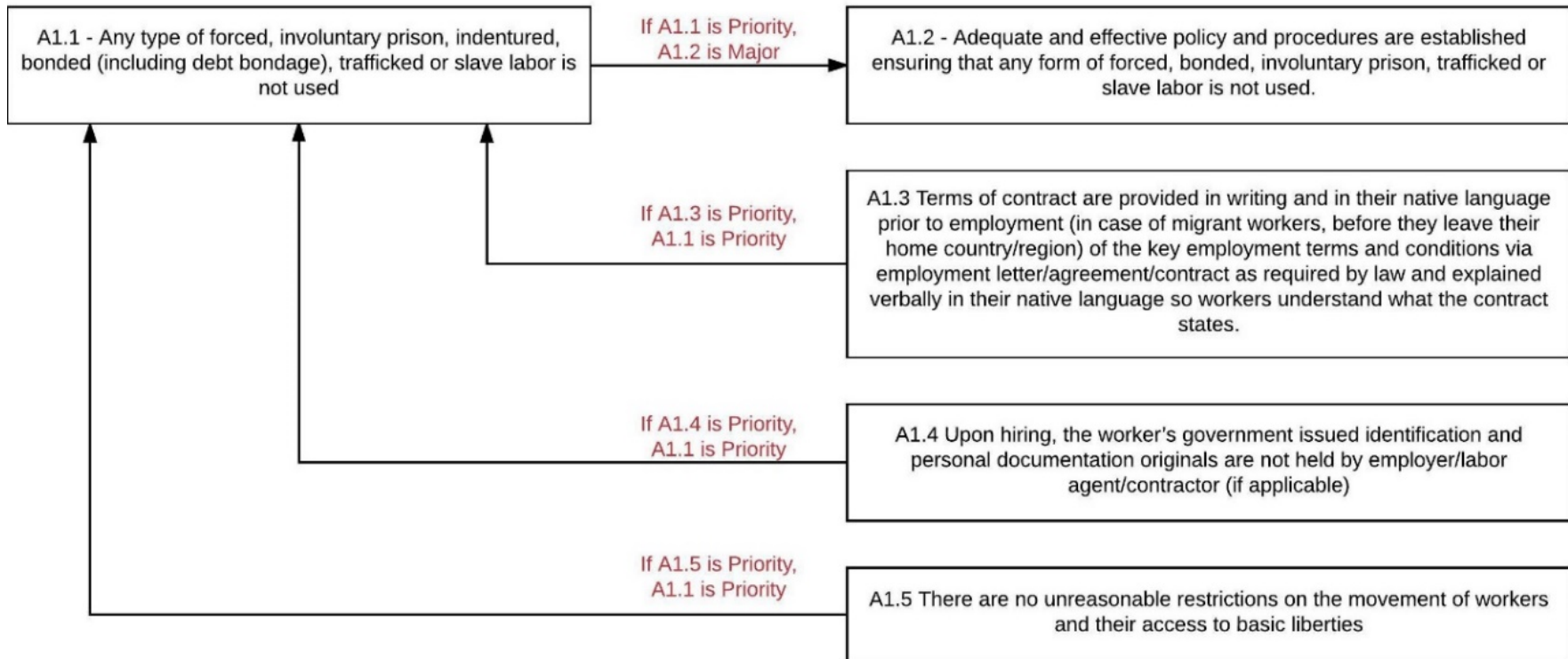
Scenario 2 - Prohibited recruitment and hiring fees that were paid and reimbursed within 90 days after commencement of employment

Frequency \ Severity in monthly gross base wages	0-5%* (<1-month gross base salary)	>5%-100%* (<1-month gross base salary)	>100%* (<1-month gross base salary)
≤1% or 3 workers or fewer (whichever is greater)	Minor	Minor	Major
>1% or 3 workers or fewer (whichever is greater)	Minor	Major	Major
*total of all fees charged during recruitment and employment			

Scenario 3 - For findings other than prohibited recruitment and hiring fees paid were not reimbursed within 90 days, or as soon as practicable upon discovery:

Priority	Major	Minor	Not Applicable
One or more of the following is true: 1. Penalty to leave without reasonable notice is >3 months of gross base wages 2. Workers restricted from voluntary employment termination or penalized in other ways when giving reasonable notice. 3. A Priority item in A1.3, A1.4 or A1.5 4. Non-voluntary labor is present (other than scenarios above or Major nonconformance)	One or more of the following is true: 1. Termination notice period more than the stricter of 1 month or law 2. Penalty to leave without reasonable notice is >60% of 1 month of gross base wages (about 2-3 weeks) 3. Historic non-voluntary labor was present in last 12 months (situation was removed, AND system was not updated)	Not Applicable	Not Applicable
Remote Verification Acceptable:	NO		

NOTE: A1 provisions are linked as per the below diagram.



A1.2 Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.

Conformance Requirements:

Site Observations	Record Review
Not applicable	1) <u>Policies</u> <ol style="list-style-type: none"> a) Adequate and effective policies and procedures are in place <ol style="list-style-type: none"> i) To ensure that forced, bonded, involuntary or exploitative prison, trafficked or slave labor is NOT permitted ii) Stating that workers are not required to pay Fees, deposits or incur debt as part of the employment iii) Stating that when employment has been terminated voluntarily or involuntarily, worker will be paid appropriate amounts for all hours worked. b) An implemented procedure to determine the specific amount of any fees and expenses paid by each individual foreign worker prior to commencement of work. 2) <u>Contracts</u> <ol style="list-style-type: none"> a) Labor Agents and Labor Contractors have executed contracts with agreement requirements to ensure conformance with the policies/procedures. 3) <u>Monitoring</u> <ol style="list-style-type: none"> a) Method of monitoring of conformance with policy, monitoring reports and corrective actions are available for review

Additional assistance:

Site Observations	Record Review
Not applicable	1) <u>Policies</u> <ol style="list-style-type: none"> a) This is applicable for direct and indirect employment workers. b) Scope of policies and procedures is during recruiting, hiring and employment. c) Stating that workers are not required to pay either as one-time or installment payments, collected directly or through wage deductions. 2) <u>Any non-conformance that is related to worker employment conditions should still be reported within their appropriate subsection elsewhere (e.g. if wages are delayed, benefits not paid, then report in A4).</u>

Rating:

Priority	Major	Minor	Not Applicable
Not applicable	One or more of the following is true: 1. No policy or procedure (must include recruitment and hiring practices, termination and other fees/deposits/debt) 2. No monitoring of program effectiveness 3. Trafficked or slave labor prohibition requirements are not in contracts with Labor Agents and Contractors 4. No contracts are in place between the Auditee and Labor Agents and Contractors 5. Any priority in A1.1	One or more of the following is true: 1. Policy and procedures are in place for recruitment but one of the implementation components is missing (e.g., monitoring, correction) in either direct workers or those employed by Labor Agents and Contractors 2. Monitoring of program effectiveness is in place but corrective actions on findings are open/not in place	Not applicable
Remote Verification Acceptable:	NO		

A1.3 Terms of **employment** are provided in writing and in their native language prior to employment (in case of **foreign** migrant workers, before they leave their home country/region and no substitution or change(s) was made in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms) via employment letter/agreement/contract and explained verbally in their native language so workers understand what the **terms of employment** states.

Conformance Requirements:

Site Observations	Record Review
Not applicable	<ol style="list-style-type: none"> 1) All workers <ol style="list-style-type: none"> a) Workers are informed prior to employment of the key employment terms and conditions either verbally and in writing via terms of employment in their native language. b) Terms of employment state that workers can resign without penalty if reasonable notice is given as per terms of employment 2) Foreign migrant workers: <ol style="list-style-type: none"> a) Workers are informed prior to employment and leaving their home country of the key employment terms and conditions either verbally and in writing via terms of employment in their native language. b) No substitution or change(s) allowed in the terms of employment upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms c) Terms of employment comply with ILO conventions on foreign migrant workers 3) Verbal explanation to workers of the key components of the employment conditions in a language they can understand: <ol style="list-style-type: none"> a) Nature of work b) Working hours, Days off and holidays c) Leave entitlements d) Benefits (housing, transportation, uniforms, ...) e) What fees the worker will be charged and the amount(s) f) Wages and wage deductions (including all components of social insurance) and how these are calculated. g) Other non-legally required benefits provided (pension, insurances, ...)

Additional assistance:

Site Observations	Record Review
Not applicable	<ol style="list-style-type: none"> 1) Penalty = no threat of punishment, fines, violence, or withholding wages) 2) Any terms of employment changes are declared and follow good practice communication/negotiation with worker 3) Defined worker groups (e.g. student, intern, dispatch, etc.) in compliance with legal and/or customer requirements 4) A priority rating on this finding also requires a priority rating for A1.1

Rating:

Priority	Major	Minor	Not Applicable
<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. Terms of employment substitution for materially worse conditions (e.g. lower wages, different production facility, undisclosed fees for housing, food, etc.) 2. No terms of employment or conditions communicated prior to employment (before leaving home in case of migrant worker) 3. Terms of employment contain language to limit the workers' ability to voluntarily terminate their employment 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. No terms of employment or not in native language or not delivered prior to departure (in case of foreign migrant workers) BUT conditions were communicated before work began (before leaving home in case of migrant worker) 2. Terms of employment or conditions communicated were incomplete (missing one or more elements) 3. Defined worker group mix (e.g. student, intern, dispatch, etc.) exceeds legal limits by >5% 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. Terms of employment are provided but are incomplete (e.g. missing terms or conditions) 2. Defined worker group mix (e.g. student, intern, dispatch, etc.) exceeds legal limits by >1% but ≤5%. 	<p>Not applicable</p>
<p>Remote Verification Acceptable:</p>	<p>NO</p>		

A1.4 Upon hiring, the worker's government issued identification and personal documentation originals are not held by employer/Labor Agent or Contractor (if applicable)

Conformance Requirements:

Site Observations	Record Review
1) Workers can demonstrate where personal documents are kept. 2) Workers maintain possession or control over their identity documents	1) Policy a) Adequate and effective policies and procedures is in place stating no government issued identification or personal documents originals are held or stored. 2) Worker possession a) Worker files contain no workers' personal documentation originals Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents.

Additional assistance:

Site Observations	Record Review
	1) Policy/Procedures a) Auditee may request, where permitted, copies of the original documents). 2) Worker possession a) Workers' personal documentation originals: e.g. passport; work visa/permit; citizenship, residence, identification, social insurance cards/documents; birth certificate; bank documents; ...). b) Employers can only hold documentation if such holdings are required by law. In this case: i) Procedures are in place for safe keeping of only those personal documents required by law. ii) Personal documents must not be tampered with or damaged in any way. iii) At no time should workers be denied access to their documents. iv) In no case shall there be a fee for the safe keeping of government-issued identification, passports or work permits. 3) <u>A priority rating on this finding also requires a priority rating for A1.1</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Any original personal documents are destroyed, concealed, confiscated, involuntarily held or access is denied when requested.	One or more of the following is true: 1. Original personal documents are kept 2. There is no policy for document safekeeping and/or worker access to their documents when the law requires holding original documents 3. For workers in any form of company/agent/contractor provided living accommodations, access to personal secure storage is inhibited in >5% of cases.	One or more of the following is true: 1. When the law requires holding original documents, a safe keeping policy and procedures are in place, but workers cannot access their documents within 12 hours. 2. For workers in any form of company/agent/contractor provided living accommodations, access to personal secure storage is inhibited in ≤5% of cases.	Not Applicable
Remote Verification Acceptable:	NO		

A1.5 There are no unreasonable restrictions on the movement of workers and their access to basic liberties

Conformance Requirements:

Site Observations	Record Review
1) Workers move freely when needed to access basic liberties (no systems for restriction in place such as toilet passes). 2) Workers are free to leave the Auditee location including if applicable, workers' dormitories or living quarters when not engaged in work.	1) Policy a) Adequate and effective policies and procedures on freedom of movement are in place. 2) Records a) Entry and leave records (if applicable) show no restriction in movement including if applicable, workers' dormitories or living quarters

Additional assistance:

Site Observations	Record Review
1) Freedom to enter and leave site does not apply to prison labor 2) If workers reside on site (dormitory or living quarters), access to the dormitory or living quarters is open or there are no unreasonable restrictions through procedure or undue security guard restrictions, on worker's ability to leave the facility including during workers' rest time.	1) Records a) Entry and leave records e.g. toilets, drinking water, external medical facilities, factory/dormitory or living quarters exit and entry. 2) <u>A priority rating on this finding also requires a priority rating for A1.1</u>

Rating:

Priority	Major	Minor	Not Applicable
<p>One or more of the following is true:</p> <ol style="list-style-type: none"> Any situation that is putting workers at a health or safety risk (e.g. locking in factory or dormitory or living quarters). Workers are restricted from movement through threat of firing, reporting to authorities or similarly severe threat. 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> Workers are restricted from movement through threat or penalty (but not a threat of firing, reporting to authorities or similarly severe threat), even if a policy is in place. 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> No policy or procedures are in place on freedom of movement but there are no restrictions on freedom of movement. Non-coercive restrictions systems/procedures are used (e.g. toilet passes) 	<p>Not Applicable</p>
<p>Remote Verification Acceptable:</p>	<p>NO</p>		

A2) Young Workers

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Participant shall implement appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety of young workers, including night shifts and overtime. Participant shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. Participant shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation is provided.

A2.1 Workers are not below the minimum age

Conformance Requirements:

Site Observations	Record Review
1) No workers on site appear to be under the minimum age.	1) Records a) Personnel files shows workers are above minimum age or above company policy minimum age (whichever is greater)

Additional assistance:

Site Observations	Record Review
	1) Records a) The worker roster shows all workers are above minimum age or above company policy minimum age (whichever is greater) 2) Auditors need to ensure that sample covers all types of workers/employees.

Rating:

Priority	Major	Minor	Not Applicable
1. Confirmed underage workers are present at the facility or were present at the facility in the last six months	1. Two or more of the minimum requirement elements is missing or ineffective	1. One of the minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	Not Applicable
Remote Verification Acceptable:	NO		

A2.2 An adequate and effective policy and process is established to ensure that workers below the legal minimum working age are not hired either directly or indirectly via labor agencies/contractors.

Conformance Requirements:

Site Observations	Record Review
Not applicable	1) Policy <ul style="list-style-type: none"> a) Adequate and effective child labor prohibition policies and procedures are in place b) There is an adequate process in place to verify the reliability of age documents. Age verification must include visual verification of a government recognized photographic identification document. c) There is a reliable ID verification system to control the workers' access into the facility d) Auditee does not refuse the worker's job application after the "child" worker's age meets legal requirements. 2) Underage assistance <ul style="list-style-type: none"> a) There is a procedure to assist underage children found working for the Auditee that is designed to provide for the welfare of the child

Additional assistance:

Site Observations	Record Review
	1) Policy <ul style="list-style-type: none"> a) Inspect and cross-reference to verify the validity at least two types of official ID* b) Reliable ID verification system to control the workers' access into the facility e.g. finger printing or ID card with owner's photograph to prevent under-age workers entering the facility by using another person's ID c) ID types for verification and cross-reference <ul style="list-style-type: none"> i) Matching photographic ID to worker's face ii) Verification through third-party resources where available, such as Internet resources or local government offices iii) Birth certificate iv) Government-issued personal identification card v) Driver's license vi) Voting registration card vii) "Official stamped" copy of a school certificate viii) Affidavit from local government representative ix) Foreign national work permit or other government recognized document. 2) Underage assistance includes <ul style="list-style-type: none"> a) Health exam and appropriate action if necessary b) Completion of compulsory schooling c) Maintaining the child's income until legally eligible to work d) When they exist, and are acceptable by law, to move underage workers into proper apprenticeship positions, restricting their hours and type of work to accommodate educational needs, as required, rather than discharging or fining of these workers.

Rating:

Priority	Major	Minor	Not Applicable
1. Child or underage workers are hired directly or indirectly through a labor agent/contractor	One or more of the following is true: 1. No formal policy and process in place AND no proof-of-age documentation 2. If A2.1 Priority, then default Major Non-conformance for inadequate process	1. Formal policy in place, however, the process is incomplete, or proof-of-age documentation is missing	Not Applicable
Remote Verification Acceptable:	NO		

A2.3 Workers under the age of 18 are not allowed to perform work that is likely to jeopardize the health or safety of these young workers, including night work or overtime.

Conformance Requirements:

Site Observations	Record Review
1. No workers under 18 are performing jobs that are hazardous	1) Policy <ul style="list-style-type: none"> a) Adequate and effective young worker policies and procedures are in place b) Implementation mechanisms are clearly defined and implemented including: <ul style="list-style-type: none"> i) Health checks if required by law ii) Clear risk evaluation iii) Restriction on hours worked and time of day worked iv) Identification and assignment of young workers to non-hazardous positions v) Young workers are not allowed night work or overtime 2) Records <ul style="list-style-type: none"> a) The implementation mechanisms are reflected in personnel files, medical files and work time records.

Additional assistance:

Site Observations	Record Review
	1) Policy <ul style="list-style-type: none"> a) Night work: Night work for Young Workers may be defined specifically by local law though generally means any consecutive period of at least 7 hours between 10 PM and 7 AM b) Immediate containment, (i.e. re-assignment, putting on to day shift only ...not termination) is required in Priority and Major findings regarding young workers 2) Records <ul style="list-style-type: none"> a) The analysis 100% of Young Worker working hours, overtime, days of rest are to be noted here in A2.

Rating:

Priority	Major	Minor	Not Applicable
One or more of the following is true: 1. Young workers are doing hazardous work 2. Young workers are working overtime 3. Young workers are doing night work	One or more of the following is true: 1. No policy 2. Two or more of the minimum requirement elements is missing or ineffective	1. One of the minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	1. Policy and implementation mechanisms are in place <u>AND</u> No workers under age 18 on site.
Remote Verification Acceptable:	NO		

A2.4 Adequate and effective Apprentice/Intern/Student Worker employment policies and procedures are in place.

Conformance Requirements:

Site Observations	Record Review
<p>1) Student workers/interns/apprentices only perform tasks related to their field of study or learning of a new vocation and shall not perform the tasks prohibited by applicable laws.</p>	<p>1) Policy</p> <ul style="list-style-type: none"> a) Adequate and effective policies and procedures on Apprentice/Intern/Student Worker’s assignments: <ul style="list-style-type: none"> i) If applicable, a written policy stating that the Auditee does not hire apprentices/interns/student workers. ii) A commitment to only providing internships/student workers assignments and apprenticeships that complement their course of study field or learning of a new vocation; iii) Maximum duration of apprenticeship (not more than 6 months if worker is paid below minimum wage); iv) No agency or intermediary may be used in connection with the recruitment, hiring, arrangement, and management of student workers, interns or apprentices; v) All work is voluntary (including choice of learning placement assignment); vi) Prohibition of use of student workers, interns or apprentices to simply fill a labor shortage; <p>2) Records</p> <ul style="list-style-type: none"> a) Tri-partite agreement: If applicable, documented specific requirements on tri-party agreement (student workers (and/or legal guardian), school and Auditee) b) Personnel records: c) Maintenance of student worker/intern or apprentices' records in personnel files (includes agreement if applicable, learning objectives, evaluations, reference to training material, assignment, ...); d) Details on promotion/hiring opportunities after successful apprenticeship, eligibility, recruitment, employment agreement, nature of work, working hours, wages and benefits <ul style="list-style-type: none"> i) Training material: An outline of training program and copies of the training material are available at all times

Additional assistance:

Site Observations	Record Review
	<p>1) Policy</p> <ul style="list-style-type: none"> a) If the student worker/intern or apprentice is a young worker, then all young worker requirements in A2.3 apply (report in A2.3) b) An apprenticeship is different from worker probation period. Apprentice/ intern/student worker programs are regulated by law in most countries, with specific limits on: <ul style="list-style-type: none"> i) Working hours shall also not conflict with the student worker’s school attendance, duration of training period, and number of times the same worker can be classified as a trainee; ii) Auditee shall not deduct educational fees from the student worker’s wages nor shall they deduct placement fees from the student worker’s wages; iii) Auditee shall ensure that the student worker is insured against accident or liability and that the student worker is fully covered for any other forms of insurance required by law or regulation; iv) The period where wages can be below minimum wage as per law should be limited and reasonable in duration or not longer than 6 months, whichever is stricter; and

	<ul style="list-style-type: none"> v) Student workers/interns/apprentices should only be assigned to work activities that complement the academic degree/certificate or skill enhancement learning goals. <p>2) Records</p> <ul style="list-style-type: none"> a) Tri-partite agreement: <ul style="list-style-type: none"> i) Student worker's full name ii) Student worker's emergency contact information iii) The name and address of the student worker's school iv) The name and address of the Auditee, etc. v) Living conditions (if applicable) vi) Wages and benefits vii) Costs (if any) for meals and accommodation (must be no higher than a fair market rate) viii) Working hours ix) Nature of work and place where it will be performed x) Signed in three copies
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Rating:

Priority	Major	Minor	Not Applicable
1.	One or more of the following is true: 1. Work performed by apprentices is not related to a field of study or learning of a new vocation. 2. Apprenticeship where worker is paid below minimum wage is longer than 6 months (longer than 6 months is only permitted if legal requirement) 3. No tri-party agreement among the school, factory and student/parent 4. Intern, student worker or apprentice is hired through a labor agent/contractor 5. Two or more of the minimum requirement elements are missing or ineffective	One or more of the following is true: 1. No policy on learning programs in place 2. No school due diligence performed 3. One of the minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	1. A policy on learning programs is in place <u>AND</u> no student workers, interns or apprentices on site
Remote Verification Acceptable:	NO		

REFERENCE: The table below summarizes specific requirements for student workers, interns, and apprentices:

Requirement	Student worker	Intern	Apprentice
Tri-party agreement (student, school, and company/Auditee)	Yes	N/A	N/A
No financial/scholastic penalty (note scholastic penalty is allowed only if directly related to underperformance on educational component of program)	Yes	Yes	N/A
Due Diligence: verify that worker is actively enrolled in a valid program of study at an educational institution. Take corrective actions to address any non-conformance by an educational institution and establish sanctions as appropriate, including termination of the relationship	Yes	No	N/A
Wage rate- paid at least the minimum wage	Yes	Yes (at least minimum wage during intern period) unless their performance is significant below expectation for that wage cycle	Yes, unless Law specifically defines a lower wage for this type of worker

^{a)} Agreed apprentice wage increase when meeting new skills requirements. Workers after a successful apprenticeship have clearly documented promotion and wage adjustment

A3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.

A3.1 Hours worked in a workweek over the last 12 months does not exceed 60 hours.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Records: <ol style="list-style-type: none"> a) Mandatory sample size of individual time records as well as summary reports, show the number of hours worked - including overtime - per worker per week should not exceed 60 hours 2) Waivers: <ol style="list-style-type: none"> a) If a government waiver/permit or alternative working hour system is in place, then it needs to comply with the RBA Waiver Policy (see Section C: 10 of the VAP Operations Manual). b) RBA Code requires that companies comply with local law or Code whichever is more stringent. If you have a valid and current government waiver (e.g. Comprehensive Work Hour System in China which allows shifting of overtime limits) this waiver is considered "local law." Regardless of the waiver, the 60 hours/week limit is in place.

Additional assistance:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Records: <ol style="list-style-type: none"> a) Three (3) months will be evaluated from the last 12 months; these months should typically be a peak, a low, and an average month. For each month, the following is reported: <ol style="list-style-type: none"> i) Three (3) month sample ii) Within sample, by work area iii) Within sample, by job code iv) Within sample, by nationality (if foreign migrant workers present) b) Any workers under the age of 18 must be studied separately. c) Working hours evaluation sample should be reflect the demographics of location, and not focused on highest hours only d) Use the official working hour evaluation template e) If there were multiple work hour recording systems in place during the previous 12 months, the most recent system is to be evaluated. A minimum of 3 months must be in place and sampled and the sample size should be 3 times the normal sample size. f) Unless specified otherwise by local legal requirements, this provision does not apply to exempt workers, including those in executive, managerial, or professional positions. g) If 60 hours limit are exceeded, ensure this was not because of an Emergency or Unusual Situation. Exceptional circumstances must be documented at the time of the Emergency or Unusual Situation. h) Priority audit: <ol style="list-style-type: none"> i) For a 90-day Priority audit the trend since last audit must be reviewed. For rating the month immediately preceding the priority audit is used at 3 times normal sample rate. ii) For a 180-day Priority audit the trend since last audit must be reviewed. For rating the 3 months immediately preceding the priority audit is used at normal sample rate.

Rating: If workers under the age of 18 are found to be working in excess of the stricter of law or 60 hours per week is a Priority Non-Conformance.

Work Hours/Week	% of Sample Work Weeks (Total or Specific Area or Function or Nationality)				
	≤1%**	>1% to ≤5%	>5% to ≤15%	>15% to ≤40%	>40%
>84 hours/week	Priority				
>72 hours/week to ≤84 hours/week	Conformance	Minor	Major	Priority	Priority
>60 hours/week to ≤72 hours/week	Conformance	Opportunity for Improvement	Minor	Major	Priority
>Local law* to ≤60 hours/week	Conformance	Opportunity for Improvement	Minor***	Minor***	Major
<Local law* AND ≤60 hours/week	Conformance				

* Local law is stricter than 60 hours/week

** No tolerance allowed if working hours are >84hours/week

*** Legal non-conformance is rated a major non-conformance except if working hours if below 60h/week but above local law for ≤40%

Remote Verification Acceptable	NO
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A3.2 Workers receive at least one (1) day off every seven (7) days

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Records: a) Mandatory sample size of individual work records as well as summary reports (if available) show that the maximum consecutive days worked is equal to or less than 6 days.

Additional assistance:

Site Observations	Record Review
Not Applicable	1) Records: a) Three (3) months will be evaluated from the last 12 months; these months should typically be a peak, a low, and an average month. For each month, the following is reported: i) Three (3) month sample ii) Within sample, by work area iii) Within sample, by job code iv) Within sample, by nationality (if foreign migrant workers present) b) Any workers under the age of 18 must be studied separately. c) Working hours evaluation sample should be reflect the demographics of location, and not focused on highest hours only d) Use the official working hour evaluation template e) If there were multiple days off recording systems in place during the previous 12 months, the most recent system is to be evaluated. A minimum of 3 months must be in place and sampled and the sample size should be 3 times the normal sample size. f) Unless specified otherwise by local legal requirements, this provision does not apply to exempt workers, including those in executive, managerial, or professional positions. g) If 6 consecutive days are exceeded, ensure this was not because of an Emergency or Unusual Situation. Exceptional circumstances must be documented at the time of the Emergency or Unusual Situation. h) Priority audit: i) For a 90-day Priority audit the trend since last audit must be reviewed. For rating the month immediately preceding the priority audit is used at 3 times normal sample rate. ii) For a 180-day Priority audit the trend since last audit must be reviewed. For rating the 3 months immediately preceding the priority audit is used at normal sample rate.

Rating:

If workers under the age of 18 are found to be working consecutive days in excess of the stricter of law or 6 consecutive days is a Priority Non-Conformance unless required for their qualification/certification under A2.4.

Consecutive Days	% of Sampled Workers (Total or Specific Area, Function or Nationality)			
	≤1%**	>1% to ≤5% of sampled workers	>5% to ≤40%	>40%
≥24 Consecutive Days	Priority			
>12 to <24 Consecutive Days	Minor	Minor	Major	Priority
>6* to ≤12 Consecutive Days	Conformance	Minor	Minor	Major
≤6* Consecutive Days	Conformance			

*Or legal requirements if stricter than 6 consecutive days

** A tolerance of 1 percent of population is allowed, i.e. if no more than 1 percent of workers is detected to work more than the legal limit then this is conformance, except if the days off are more than 12 or more days, in which case the 1 percent tolerance does not apply.

Remote Verification Acceptable	NO
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A3.3 Adequate and effective policy and system/procedures are established to accurately determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours

Conformance Requirements:

Site Observations	Record Review
<p>1) Recording devices: Time Recording Devices are present, and all are in working order.</p>	<p>1) Policy:</p> <ul style="list-style-type: none"> a) Adequate and effective working hours/days off policies and procedures are in place to <ul style="list-style-type: none"> i) Accurately determine ii) Record iii) Manage iv) Control working hours including overtime and days off. b) If non-conformance is detected, documented corrective action should be implemented and progress against the corrective action documented. <p>2) Records:</p> <ul style="list-style-type: none"> a) Review the company's time records and system for recording time worked to determine that time is recorded accurately and completely.

Additional assistance:

Site Observations	Record Review
	<p>1) Policy:</p> <ul style="list-style-type: none"> a) The policy and implemented process should at a minimum: b) Ensure awareness of requirements of compliance with local and national laws and regulations regarding working hours and days off and RBA requirements c) Integrate legal and RBA requirements d) Monitor actual performance e) Use a strategy to ensure conformance with all requirements. <p>2) Records:</p> <ul style="list-style-type: none"> a) Review the company's time records and system includes: b) All workers have a time record. c) Each time record is accurate and can be cross-referenced with leave records, production records, maintenance, procurement or other relevant records. d) Regular working time and overtime recording e) Adequate detail to allow for daily, weekly and monthly working time and overtime analysis. <p>3) <u>Unintentional errors found in records are covered here. If intentional errors are found, then this is covered in section D3.1</u></p>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. No time recording devices present or time recording devices not accurate or not in good working order 2. Time records do not match other relevant Auditee records (for greater than 5 percent of population) 3. Time records are not accurately adjusted after worker complaint 4. Two or more of the minimum requirement elements is missing or ineffective 5. If the working hours controls are found to be in non-conformance (minor, major or priority finding in A3.1, and / or minor, major or priority in A3.2), then major finding in A3.3 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. Time records not matching other relevant Auditee records for >1% to ≤5% of population 2. One of the minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 	Not Applicable
Remote Verification Acceptable:	NO		

A3.4 Workers are allowed mandated breaks, holidays and vacation days, including time off when ill or for maternity leave.

Conformance Requirements:

Site Observations	Record Review
1) Workers take mandatory breaks which includes at least one meal break per shift	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policies and procedures for sick leave, holidays, vacation and paternity/maternity leave are in place. b) Workers are provided with mandated meal and rest breaks, leave periods, holidays, and vacation days 2) Records <ul style="list-style-type: none"> a) Leave records for 12 months are securely kept, accurate and consistent with medical certificates, actual leaves and holidays. b) Payroll records for these absences show that there was no financial penalty for maternity or sick leave.

Additional assistance:

Site Observations	Record Review
	1) Policy <ul style="list-style-type: none"> a) Workers receive a reasonable amount of time off for sickness or maternity without job loss or financial penalty when supported with a medical certificate. b) Most countries require workers to be given a 20 or 30-minute break every two or four hours, as well as a defined meal break. Compare the company's practices to local legal requirements.

Rating:

Priority	Major	Minor	Not Applicable
1. Workers are not allowed time off for illness or maternity with valid medical certificate	One or more of the following is true: <ul style="list-style-type: none"> 1. No policy in place and mandatory breaks/holidays are not provided or guaranteed. 2. Leave records are not kept or accurate. 	Holidays and mandatory breaks are provided but: <ul style="list-style-type: none"> 1. No policy is in place 2. Policy is not communicated to workers 	Not Applicable
Remote Verification Acceptable:	NO		

A4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

A4.1 Wages for regular and overtime hours are correctly calculated, and paid to all workers

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Policy <ol style="list-style-type: none"> a) Adequate and effective wages and compensation policies and procedures are in place: b) "Pay equals time worked" applies; this means any company-required activity c) All workers shall be paid no less than the agreed* wage for all regular hours. d) overtime and other compensation and benefits are paid and are on top of agreed* wage for regular hours e) Payment made to leavers (resigned workers). 2) Records <ol style="list-style-type: none"> a) Wages benefits, and overtime are correctly calculated and accurate pay records are maintained for 12 months. b) Wages are paid directly to workers (or a legally designated third party) with no unauthorized deductions (including for disciplinary measures) in a timely manner. c) For recurring pay (including overtime, other) should not be delayed more than two days after the agreed timing for payment d) For severance pay, payment (including resigned workers) must be made in compliance not later than one month after final day on the job

Additional assistance:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Policy <ol style="list-style-type: none"> a) Company-required activity e.g. briefings, trainings, daily overview meetings, shall be paid equal to the time of this mandatory attended activity. b) A worker's base wage shall always be set at or above minimum wage for the classification of worker. c) This applies to both direct and indirect workers. d) * Agreed = the stricter of legal minimum wage, wage stipulated in employment contract or wage set in Collective Bargaining Agreement e) NOTE: In case the country does not have a legal set minimum wage, then the industry prevailing wage will apply as a standard. The industry benchmark and reference must to be specified under legal references in this case. 2) Records <ol style="list-style-type: none"> a) Evaluate the company's pay system and records to determine if workers are paid at least the legal minimum wage applicable in the country of operation or the amount specified in worker contract. b) Document review needs to be for at least three months (Average, peak and low activity months) and for all workers in the statistical sample. c) For each of the months specify in report the minimum wage, and the average wage for obvious worker categories. d) Look for deductions from workers' pay that can reduce compensation to below minimum wage. e) Assess the impact of the production system on pay – verify that production targets do not drag workers below the legal minimum wage. f) Review payroll records and look for the lowest compensation totals to determine all mandated pay and benefits are provided. g) Bank transfer records, or other equivalent proof of payment, which includes date and amount due for each worker 3) Student workers/interns/apprentices must be reviewed as a separate category

Rating:

Priority	Major	Minor	Not Applicable
1. $\geq 20\%$ of sample is paid less than agreed* wage	No policy is in place AND one or more of the following is true: <ol style="list-style-type: none"> 1. Wage calculations have structural calculation error 2. Percentage of sample workers paid below agreed* wage is $\geq 5\%$ and $\leq 20\%$ 3. Percentage of sample or population not paid benefits or correct overtime compensation is $\geq 5\%$ 	1. No policy is in place, but calculations and payment conform to legal requirements, contract or RBA requirements	Not Applicable
Remote Verification Acceptable:	NO		

A4.2 For each pay period, workers are paid on a timely basis and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Records a) Workers are provided with payroll receipts that clearly indicate compensation, including overtime hours and overtime compensation levels and detail of deductions (e.g. insurance contributions, employer and worker contributions, ...)

Additional assistance:

Site Observations	Record Review
Not Applicable	1) Records a) Review evidence that workers are given information relating to wages in an understandable form. b) Verify for statistical sample and for a minimum of three months: i) worker signatures on pay registers c) In most countries, the law states the requirement of the employer to contribute a portion of worker's wages to national or private insurance schemes. These generally consist of retirement, unemployment, accident, medical and possibly others. These needs to be communicated to workers and reflected on worker wage receipts. d) <u>RBA DOES NOT accept a signed agreement with a worker that allows to deduct the social insurance as conformance option to legal social insurance compliance.</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Payments have been delayed for more than 1 month beyond regular payment cycle	One or more of the following is true: 1. Wages and compensation are not communicated to workers in the form of pay slips, pay roll receipt or equivalent 2. No training or explanation of wages are provided to workers 3. Payments are delayed less than one month beyond normal payment cycle and for >5 percent of worker samples	One or more of the following is true: 1. Communication and training are provided but >5 percent of the worker sample do not understand how wages are calculated 2. Payments have been delayed less than one month beyond normal payment cycle and for ≤ 5 percent of worker sample	Not Applicable Not Applicable
Remote Verification Acceptable:	YES		

A4.3 Wages are not deducted or reduced for disciplinary reasons

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Policy a) Adequate and effective policies and procedures prohibiting disciplinary wage deductions are in place including "Pay equals time worked" 2) Records a) Disciplinary records pay slips and payment records of wages or equivalent not show any form of disciplinary wage deduction

Additional assistance:

Site Observations	Record Review
	1) Policy a) "Pay equals time worked" applies, this means that if a worker is late the impact on its wages can be no more than the time the worker was late 2) Records a) Evaluate for 3 months the statistical sample on Disciplinary records, pay slips and payment records of wages or equivalent

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. Wage deductions are employed by the Auditee as a standard disciplinary measure	1. Wage deductions are not employed by the Auditee however no clear policy statement on this is in place	Not Applicable
Remote Verification Acceptable:	NO		

A4.4 Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Records <ul style="list-style-type: none"> a) <u>Calculations:</u> Records of employer contributions to worker insurance schemes, e.g. unemployment, retirement/pension, health/medical, life, accident, disability, ... are available on a monthly basis that: <ul style="list-style-type: none"> i) Allows for analysis by individual worker ii) Total per contribution type. b) <u>Payment:</u> Payment records for these contributions are available for at least 12 months and payments are made timely.

Additional assistance:

Site Observations	Record Review
	1) Records <ul style="list-style-type: none"> a) Verify for at least 3 months statistical sample documents to demonstrate regulatory deduction, payment and communication to worker. b) Withholdings for taxes and other government programs should be made promptly to the applicable agency. In most countries, the law states the requirement of the employer to contribute to national or private insurance schemes. These generally consist of retirement, unemployment, accident, medical and possibly others. c) <u>RBA DOES NOT accept a signed agreement with a worker that allows to deduct the social insurance as conformance option to legal social insurance compliance.</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Payment of government or regulatory deductions have not been made or paid on time for at least 3 months	One or more of the following is true: 1. Percentage of sample or population that do not have correct required employer and employee contributions paid is $\geq 20\%$ (excluding new workers less than 2 pay cycles with the employer). 2. Required employer and employee contributions are not paid regularly or timely	One or more of the following is true: 1. Percentage of sample or population that do not have correct required employer and employee contributions paid is $< 20\%$ (excluding new workers less than 2 pay cycles with the employer). 2. Required employer and employee contributions are paid timely but not communicated to workers.	1. No withholdings or required contributions
Remote Verification Acceptable:	YES		

A5) Humane Treatment

There is to be no harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

A5.1 No evidence of harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers

Conformance Requirements:

Site Observations	Record Review
1) No identification of possible instances of inhumane treatment	1) Records a) Grievance records do not show instances of inhumane treatment b) If instances are found appropriate corrective actions are taken immediately and documented c) Disciplinary records do not show inhumane disciplinary measures

Additional assistance:

Site Observations	Record Review
	1) Inhumane treatment includes harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers.

Rating:

Priority	Major	Minor	Not Applicable
1. One or more case of inhumane treatment is reported without action taken by Auditee management	1. Less than two (2) inhumane treatment cases are reported with actions still in progress	1. Less than two (2) inhumane treatment cases were reported with actions completed but no measures on an ongoing basis.	Not Applicable
Remote Verification Acceptable:	NO		

A5.2 Adequate and effective policies and procedures on decent/humane working conditions and fair treatment of workers are established

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Policy a) Adequate and effective policies and procedures on humane treatment are in place

Additional assistance:

Site Observations	Record Review
Not Applicable	1) Policy a) Inhumane treatment includes harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. No disciplinary policy/procedures	1. Disciplinary policy and disciplinary action records are but incomplete	Not Applicable
Remote Verification Acceptable:	NO		

A5.3 Disciplinary actions are recorded, consistent with the procedures and reviewed by management

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Records <ul style="list-style-type: none"> a) Records of all cases of disciplinary action are available for last 12 months b) All records of disciplinary action against workers must be reviewed by management and verifiably communicated to them c) Disciplinary records show disciplinary actions with signature or confirmation of worker

Additional assistance:

Site Observations	Record Review
	1) Policy <ul style="list-style-type: none"> a) Inhumane treatment includes harsh or inhumane treatment, including <u>violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers</u>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: <ul style="list-style-type: none"> 1. Disciplinary action records are not available 2. Disciplinary action records are not consistent with company procedures 	1. Disciplinary action records are available, but workers do not confirm or sign the records/actions	Not Applicable
Remote Verification Acceptable:	YES		

A6) Non-Discrimination/[Non-Harassment](#)

Participants should be committed to a **workplace** free of harassment and unlawful discrimination. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).

A6.1 No evidence of discrimination

Conformance Requirements:

Site Observations	Record Review
<p>1) No visible instances of discrimination</p>	<p>1) Human resources process:</p> <ul style="list-style-type: none"> a) Application questions and testing should not exist/occur which are not required OR are necessary to evaluate the candidate's fitness for the job b) Hiring and termination records confirm the candidate's ability to perform the job's requirements. c) Job postings and advertisements do not discriminate. d) Job descriptions: Written job descriptions that focus solely on occupational qualifications, not personal characteristics are in place. <p>2) Medical tests:</p> <ul style="list-style-type: none"> a) Workers or potential workers are not subjected to medical tests that could be used in a discriminatory way. b) Health tests, pregnancy or virginity testing, or contraception are not used as a condition of employment. <p>3) Pregnancy/Maternity/Paternity:</p> <ul style="list-style-type: none"> a) All conditions regarding pregnancy and postnatal employment protections, benefits, and pay are met <p>4) Personnel records:</p> <ul style="list-style-type: none"> a) Hiring records, promotion records, pay roll, general training and disciplinary records for statistical sample are reviewed for consistency of policy and to look for evidence of discrimination including hiring, wages, promotions, rewards, and access to training.

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) Medical tests: <ol style="list-style-type: none"> a) In some cases, local governments require health tests for foreign workers prior to issuance of work visas. b) No discrimination on the basis of a person's medical status, make any employment decisions that negatively affect the person's employment status unless such decision is dictated by the inherent requirements of the job or is prudent for workplace safety. c) No discrimination against a worker in eligibility for another position based on the worker's refusal to take a medical test where there is no required medical test for such position. 2) Pregnancy/Maternity/Paternity: <ol style="list-style-type: none"> a) Review for discrimination based on pregnancy tests, maternity and paternity leaves: <ol style="list-style-type: none"> i) Refuse to hire an applicant for a non-hazardous position; or ii) Terminate a worker's employment solely based on the worker's pregnancy, virginity or parental status. 3) <u>Discrimination cases are applicable if these cases have a documented basis, allegations are not considered as a discrimination case.</u> 4) <u>Trade union member discrimination based on their trade union status is listed in A7.4</u>

Rating:

Priority	Major	Minor	Risk of Non-Conformance	Not Applicable
1. Management discriminates in a structural way that causes significant harm to a protected class.	1. Two or more discrimination cases are reported with actions not taken.	1. One discrimination case was reported with actions completed but no preventative measures on an ongoing basis	1. Discrimination case allegations exist which are open (not investigated/ closed). Discrimination exists because of current legal provisions in the country of operation.	Not Applicable
Remote Verification Acceptable:	NO			

A6.2 Adequate and effective policies and procedures that ban discrimination and harassment are in place.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policies and procedures that ban discrimination are established. <ul style="list-style-type: none"> i) Decisions in hiring, employing (such as compensation, promotion, access to training, ...), or terminating workers are based solely on the candidate's ability to perform the job's requirements. ii) Auditee periodically reviews hiring practices, compensation records, employee evaluation and promotion documents, training records, employee benefits policies and procedures, and termination/disciplinary records to determine that there is no prohibited discrimination.

Additional assistance:

Site Observations	Record Review

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. No non-discrimination policy	1. Non-discrimination policy in place, but does not protect all RBA-protected classes	Not Applicable
Remote Verification Acceptable:	YES		

A6.3 Reasonable accommodation for religious practices is provided.

Conformance Requirements:

Site Observations	Record Review
1) In countries and/or workplaces where a significant percentage of the workers require prayer spaces to perform religious observances; clean and safe prayer /religious areas are provided.	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policies and procedures are in place to reasonably accommodate for religious practices and adjustments to the work environment to allow a worker to comply with their religious beliefs while at work or in the job application process. b) A mechanism for receiving religious accommodation requests is in place 2) Records <ul style="list-style-type: none"> a) Requests are kept, reviewed and decision and reason of decision of accommodation (or no accommodation) is provided to the requestor in a timely manner. 3) CBA <ul style="list-style-type: none"> a) Granting a religious accommodation should be evaluated against the Collective Bargaining Agreement (CBA - if in place) and may vary from the CBA.

Additional assistance:

Site Observations	Record Review
	1) Policy <ul style="list-style-type: none"> a) The procedures must reasonably accommodate group or individual religious practice requests made to management and may include: <ul style="list-style-type: none"> (1) Scheduling Changes (2) Voluntary Substitutes and Shift Swaps (3) Change of Job Tasks and Lateral Transfer (4) Dress and Grooming Standards (5) Use of Employer Facilities (6) Tests and Selection Procedures b) Reasonable Religious Accommodation may be refused for safety and security concerns, after seeking alternatives (including off-site options) and/or significant impact on business operations, operating costs or other workers. 2) CBA <ul style="list-style-type: none"> a) Dialogue with worker representatives is held if there is a difference between the religious accommodation and the CBA, if this does not violate the privacy of the Reasonable Religious Accommodation requestor. 3) <u>To provide reasonable accommodation for religious practices, a facility is expected to take reasonable measures to ensure that every worker is not discriminated against based on established religion. Where significant numbers of followers of a religion require special accommodation to perform their religious obligations, the facility should work to take extra steps to provide space, time, and flexibility to allow these individuals to meet their religious obligations (e.g. absent from work by taking annual paid or unpaid leave to perform religious obligations or adjustment of work hours)</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Reasonable Religious Accommodation requests are refused by management without justification	One or more of the following is true: 1. No policy or adequate Reasonable Religious Accommodation in place 2. Prayer /religious areas are provided but not safe, clean or adequate 3. Reasonable Religious Accommodation requests are made but not evaluated or decisions are not communicated to requestor/workers	1. Reasonable Religious Accommodation records (application and responses) are not kept	Not Applicable
Remote Verification Acceptable:	NO		

A7) Freedom of Association

In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment

GENERAL NOTES

- The reference to “trade union” throughout this guidance refers to trade unions, union, and other worker representational bodies.
- For sake of brevity, the audit guidance focuses on the right of workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly. The audit guidance should also be read to encompass the rights of workers to refrain from forming and joining trade unions, collective bargaining, and peaceful assembly.
- Neutrality statement: The auditee company is responsible for ensuring their workers can exercise their rights to organize in a climate free of violence, pressure, fear, and threats. Auditee Company is not required to take an active role in supporting workers’ efforts to associate or organize.

A7.1 Workers can form or enroll in a trade union of their own free will

Conformance Requirements:

Site Observations	Record Review
1) No evident presence of violence and explicit threats of any kind 2) No evidence present of management's control of a trade union exists	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policies and procedures that respect that the right of workers to form or enroll in a trade union, or to refrain from doing so, are in place b) No interference: Policy must include that the Auditee will not interfere with and will not finance a trade union 2) Records/minutes <ul style="list-style-type: none"> a) There are no documented episodes of violence, explicit threats of any kind or any other violations of the right to freedom of association. b) Trade union meeting minutes and financial records for 12 months, if available, to determine source of funding and materials; c) Management contributions are limited to providing meeting space and/or meeting materials (such as note taking material); d) Payroll records confirm that trade union employees are paid the same as other workers in similar job functions

Additional assistance:

Site Observations	Record Review
	1) Policy <ul style="list-style-type: none"> a) <u>Workers can form or join a trade union (or refrain from doing so) and are allowed to organize independently of management. Management must not interfere in the process by directly or indirectly conducting elections related to the formation, recognition or governance of a trade union. The absence of trade union does not automatically mean a non-conformance, refer to the rating for guidance.</u> b) Management should not dominate or interfere with the formation or administration of any trade union or contribute support, either financial or human resources. Where legally required, management will permit the democratic election of worker representatives.

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: <ol style="list-style-type: none"> 1. Freedom of Association is prohibited in Auditee communication 2. No specific policy or language in general policies that respects the right of the workers to form or enroll in a trade union 3. Any grievance or legal finding that the Auditee interfered with workers Freedom of Association is not acted upon 4. Auditee controls or attempts to control a trade union at the Auditee's facility. 5. Evidence that Auditee provides payments or other items of value to a trade union or the trade union's leadership or members. 	1. Policy/Communication on Freedom of Association not communicated to or not in a language understood by the worker	Not Applicable
Remote Verification Acceptable:	NO		

A7.2 Legal rights of all workers to bargain collectively, or refrain from doing so, are respected

Conformance Requirements:

Site Observations	Record Review
1) No evidence of refusal by management to enter into negotiations upon request by the trade union certified to represent workers	1) Policy a) Adequate and effective policies and procedures on collective bargaining including the recognition of the right of workers to bargain collectively, or refrain from doing so 2) Records/meeting minutes a) No evidence of refusal by management to enter into negotiations upon request by the trade union b) Auditee participates in good faith in the collective bargaining process with the trade union certified to bargain on behalf of the workers; 3) CBA a) The Collective Bargaining Agreement terms and conditions are implemented

Additional assistance:

Site Observations	Record Review
	1) CBA a) <u>If the Collective Bargaining Agreement terms and conditions are not implemented or met please list the finding in the appropriate provision</u>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Material elements of the CBA are not upheld and there is no evidence that management is acting to remediate; 2. Evidence that the CBA process is prohibited	Not Applicable	No CBA in place.
Remote Verification Acceptable:	NO		

A7.3 Participants respect the legal right of all workers to peacefully assemble as well as respect the right of workers to refrain from doing so.

Conformance Requirements:

Site Observations	Record Review
1) No signs of explicit prohibition of the right of peaceful assembly.	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policies and procedures on peaceful assembly are in place noting the right of workers; individually or collectively; to express, promote, pursue, and defend their concerns or ideas; or to refrain from doing so 2) Records/meeting minutes <ul style="list-style-type: none"> a) Respects the right of workers to individually or collectively; to express, promote, pursue, and defend their concerns or ideas as well as respect the right of workers to refrain from doing so b) Does not interfere with, restrain, or coerce workers in the exercise of their right to individually or collectively; to express, promote, pursue, and defend their concerns or ideas or to refrain from doing so

Additional assistance:

Site Observations	Record Review
	1) Policy <ul style="list-style-type: none"> a) May place reasonable time, place, and manner controls regarding assembly for purposes of maintaining a healthy, safe, and productive work environment

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Right of workers to individual or collectively raise concerns or ideas is not recognized in policy and/or has not been upheld in practice 2. Right of workers to individual or collectively raise concerns or ideas process is prohibited in Auditee communication	1. Communication about the right of workers to individual or collectively raise concerns or ideas is made, but not in a language understood by the worker	Not Applicable
Remote Verification Acceptable:	NO		

A7.4 No evidence of unequal treatment between unionized or worker representatives and other workers exists

Conformance Requirements:

Site Observations	Record Review
1) No evident presence of a prohibition of association with a trade union	1) No evidence that Auditee dismisses, disciplines, or explicitly threatens workers in order to encourage or discourage workers from forming or joining a trade union, or refraining from doing so

Additional assistance:

Site Observations	Record Review
	1) Payroll; promotion; training; disciplinary; hiring and termination records do not indicate any form of discrimination between workers; 2) <u>Management should not discriminate against workers with respect to hiring, termination, or any other term or condition of employment in order to encourage or discourage workers from forming or joining a trade union or refraining from doing so. Differences in terms and conditions of employment between unionized and non-union workers due to a collective bargaining agreement negotiated between management and a duly recognized trade union on behalf of certain workers does not constitute discrimination.</u> 3) <u>Any other form of discrimination must be listed in A6.1</u>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Mechanism to report and resolve discrimination is ineffective (two or more cases) 2. Differences in pay; promotion; training; discipline; hiring and termination records encourage or discourage workers from forming or joining a trade union, or encourage or discourage workers to refrain from doing so	1. One case exists where the mechanism to report and resolve discrimination is ineffective	1. No union (not unionized) or worker representative
Remote Verification Acceptable:	NO		

3. B. HEALTH & SAFETY

GENERAL NOTES

- For facilities with significant EHS risks an EHS expert Auditor will be added to the audit team for an expert review of these policies, programs, and performance.
- Where monitoring, testing, audits or other assessments are required and law, licenses or permits are silent on the frequency, then the frequency must not exceed three years unless there are Significant Changes to the process, facility or product use.
- A risk assessment must be updated if there is a Significant Change.

B1) Occupational Safety

Worker potential for exposure to health and safety hazards (e.g. chemical, electrical and other energy sources, fire, vehicles, fall hazards, etc.) are to be identified, assessed and mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about the risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

B1.1 All required permits, licenses and test reports for health & safety is in place and a process is implemented to ensure permits and licenses are up to date at all times

Conformance Requirements:

Site Observations	Record Review
1) License related to special equipment, such as crane, boiler, forklift, are placed at the working area	1) Process a) A documented process is in place to ensure permits are renewed before current permits expire 2) Records a) All required occupational health & safety permits and licenses are in place, available for review and valid. a) Occupational health & safety testing reports are in place, available for review. 3) Drinking water a) Drinking water testing reports are available for review. Water must be tested for those contaminants assessed to be at risk for the local region and operations.

Additional assistance:

Site Observations	Record Review
	1) Process a) A documented process e.g. a compliance calendar or reminders/tasks/calendar appointments via an e-mail system. 2) Records a) All occupational health & safety permits and licenses e.g. i) Building occupancy permits ii) Pressure vessel (e.g. boiler) permits iii) Hoist permit iv) Lift permit b) Occupational health & safety testing reports e.g. i) Industrial hygiene sampling data ii) Drinking water sampling data iii) Ventilation flow tests 3) Drinking water a) Drinking water testing is not required if local water utility company can attest water meets World Health Organization (WHO) Guidelines for Drinking-water Quality or equivalent standard b) Permits and testing (e.g. drinking water testing) related to sanitation, food and drinking water are covered under B7.1.

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Required permits, licenses or testing reports missing 2. Two or more of minimum requirement elements are missing or ineffective.	One or more of the following is true: 1. Required permits, licenses or testing reports in place but the process to secure and renew as required is not sufficiently documented or is missing some components 2. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	1. No permits or license required. No testing reports required.
Remote Verification Acceptable:	YES		

B1.2 Potential for worker exposure to health & safety hazards (e.g. chemical, electrical and other energy sources, fire, vehicles, and fall hazards) identified, assessed and mitigated using the Hierarchy of Controls.

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Controls <ul style="list-style-type: none"> a) Engineering controls are used where appropriate 2) Building <ul style="list-style-type: none"> a) Buildings are structurally sound b) Confined spaces are identified. 3) Chemical <ul style="list-style-type: none"> a) Chemicals are adequately and effectively <ul style="list-style-type: none"> i) Categorized ii) Handled iii) Stored iv) Moved <u>within</u> the facility. b) Control <ul style="list-style-type: none"> i) Access to hazardous substances is controlled ii) Potential employee exposure methods are adequate and effective such as iii) Segregation iv) Secondary containment v) Ventilation vi) Fire protection vii) Appropriate storage cabinets 4) Fall <ul style="list-style-type: none"> a) Stairways and elevated work areas are provided with appropriate guardrails and handrails and elevated work platforms are rated for load capacity b) Aisles, stairways, and work areas are free of tripping hazards (stored materials, electrical cords, ...) c) Workers are provided with appropriate fall protection for work in elevated work areas (roof work, high lift fork trucks, towers, ...). Buildings are facilitated with tie-off points to provide workers with safe anchor points in the event that they need to attach a harness. 5) Electrical and other energy sources <ul style="list-style-type: none"> a) Precautions and controls of electrical hazards are in place such as locked cabinets, closed panels, unobstructed access b) Energized parts are protected from accidental contact by enclosures and barriers and all protective methods are in place and not deficient 6) Vehicle <ul style="list-style-type: none"> a) In areas where powered industrial vehicles are used, pedestrian walkways are clearly delineated and physically separated, where possible, from vehicle operation areas 7) Fire <ul style="list-style-type: none"> a) Combustible storage is minimized and limited to areas with adequate fire detection and protection. 	<ul style="list-style-type: none"> 1) Adequate and effective process to identify, assess, and <u>mitigate using the Hierarchy of Controls potential worker health & safety hazards</u> 2) Controls <ul style="list-style-type: none"> a) Safe works practices are established and documented where engineering controls are not feasible or do not completely control the hazard. b) Confined spaces hazards are evaluated before workers are allowed to enter c) A hot work permit system is in place for welding, cutting and brazing. d) A safety inspection is performed daily or prior to each use for all industrial powered vehicles e) Electrical installations and wiring are regularly inspected and maintained to prevent electrical shock hazards (damaged cords and plugs, frayed wiring, missing protective barriers, ...) f) Lockout/tag out program is in place for work on equipment where stored energy (electrical, pneumatic, mechanical, ...) or inadvertent start-up could injure workers 3) Evaluation <ul style="list-style-type: none"> a) Documentation of procedures includes how the program is evaluated and implemented

b) Flammable and combustible materials are properly stored to prevent the accumulation of vapors. Ignition hazards (e.g. smoking, electrical sparks, open flames, ...) are eliminated in areas where combustible and flammable materials are stored or used or if there is a flammable atmosphere	
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Additional assistance:

Site Observations	Record Review
1) Hazardous chemicals are covered in C3.1	

Rating:

Priority	Major	Minor	Not Applicable
1. Imminent risk of loss of facility, life or limb	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> One or more occupational safety hazards do not have control measures to limit worker exposure Safety concerns are not evaluated or addressed Fire risks identified were not addressed (e.g. bad wiring, housekeeping of combustible materials, overloading in electricity) Two or more of minimum requirement elements are missing or ineffective. 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> Control to limit worker exposure to occupational safety hazards in place but not regularly monitored One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 	Not Applicable
Remote Verification Acceptable:	NO		

B1.3 Appropriate Personal Protective Equipment (PPE) is consistently and correctly used where required to control health & safety hazards and worker exposure

Conformance Requirements:

Site Observations	Record Review
<p>1) PPE requirements</p> <ul style="list-style-type: none"> a) PPE selection is appropriate for the given hazard b) PPE requirements should be communicated to employees via posted signs and worn by all affected people either performing those tasks or in the areas that require PPE c) Workers performing tasks that require PPE do so according to PPE procedure requirements <p>2) PPE availability</p> <ul style="list-style-type: none"> a) PPE should be made available b) PPE is in good and working condition c) PPE is appropriately stored and accessible 	<p>1) PPE is free of charge</p> <p>2) PPE process</p> <ul style="list-style-type: none"> a) Adequate and effective process is implemented to assess worker health & safety hazards and determine appropriate PPE for specific job tasks and/or areas of the facility. b) PPE requisition and renewal procedures c) Adequate and effective notification and enforcement process for PPE use is in place <p>3) Records</p> <ul style="list-style-type: none"> a) PPE adequacy evaluation records b) PPE inventory and replacement records c) PPE inventory, and logs to have new PPE d) Job specific PPE matrix e) Fit test record for respiratory protection equipment f) Wage records do not show a fee or charge for PPE

Additional assistance:

Site Observations	Record Review
<p>1) PPE requirements</p> <ul style="list-style-type: none"> a) Minimum PPE requirements for entering or working in any production area with open surface tanks of hazardous chemicals where there is a risk of contact with or exposure to the contents of the tank include respirators appropriate to the level and type of inhalation exposure (if necessary), safety shoes, long sleeves, chemically resistant gloves, and eye protection (e.g. a full-face shield and safety goggles). <p>2) PPE availability</p> <ul style="list-style-type: none"> a) PPE should be made available and worn appropriately by all who work or reside in this area for long periods of time (longer than exposure limit value) 	<p>1) PPE process</p> <ul style="list-style-type: none"> a) Hazards such as high noise, chemical use including open surface tank operations, heavy equipment use, awkward positions, work at heights, overhead hazards, etc. should all be evaluated b) PPE notification and enforcement process could include: <ul style="list-style-type: none"> i) Signs and labels ii) Regular enforcement by supervisors iii) Work area inspections <p>2) Records</p> <ul style="list-style-type: none"> a) PPE monitoring records b) PPE cleaning records <p>1) <u>PPE notification finding must be covered in B8</u></p> <p>2) <u>PPE includes all Occupational Health & Safety and Industrial Hygiene PPE</u></p>

Rating:

Priority	Major	Minor	Not Applicable
1. PPE is not worn, is not available to workers, is worn incorrectly, or is the wrong type of PPE AND there is immediate risk to workers	One or more of the following is true: <ol style="list-style-type: none"> 1. PPE is not worn 2. PPE is not worn correctly in required areas or while performing tasks that require PPE 3. PPE is not in good condition / working order, sufficient, visible or easily accessible 	1. PPE is worn in required areas, but no inspection program on safe/valid use of PPE	1. No PPE is required.
Remote Verification Acceptable:	NO		

B1.4 Reasonable steps are in place to remove pregnant women/nursing mothers from working conditions with high hazards, minimize any workplace health and safety risks to pregnant women and nursing and provide reasonable accommodations for nursing mothers

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Pregnant workers are not working in job which has a hazard to the pregnant worker and her child 2) Reasonable accommodations for nursing mothers are in place 	<ul style="list-style-type: none"> 1) General Policy <ul style="list-style-type: none"> a) Adequate and effective policies and procedures are in place to minimize the Health & Safety impact in pregnant woman and nursing mothers 2) Risk assessment <ul style="list-style-type: none"> a) Adequate and effective risk management process is in place to: <ul style="list-style-type: none"> i) Before a pregnancy is reported: assess the potential hazards to expecting mothers ii) After pregnancy is reported: a worker-specific risk assessment of the worker's job to assess risk to mother and fetus iii) After mother returns to work: a worker-specific post-natal risk assessment of the worker's job to assess risk to mother and possible impacts on the baby through breastfeeding iv) All reasonable efforts must be made to minimize the risk identified in each of the 3 risk assessments 3) Reasonable accommodation to nursing mothers <ul style="list-style-type: none"> a) Provide reasonable break time for a worker to express breast milk for her nursing child for one year after the child's birth each time such worker has need to express the milk. b) Provide a place, other than a bathroom, that is shielded from view and free from intrusion from coworkers and the public, which may be used by an employee to express breast milk 4) Records <ul style="list-style-type: none"> a) Personnel files contain specific to worker pre- and ante-natal risk assessment and actions taken in line with policy b) General risk assessment for pregnant workers reports and actions taken (if any needed) are available for review

Additional assistance:

Site Observations	Record Review
	<ul style="list-style-type: none"> 1) General Policy <ul style="list-style-type: none"> a) Applies to all types of workers (direct, indirect, dispatched, young, interns, apprentices, ...) 2) Risk assessment <ul style="list-style-type: none"> a) <u>General and specific</u> to worker risk assessment must include assessment of: <ul style="list-style-type: none"> i) Lifting/carrying heavy loads; ii) Standing or sitting still for long lengths of time; iii) Exposure to infectious diseases iv) Exposure to lead; v) Exposure to toxic chemicals; vi) Work-related stress; vii) Workstations and posture; viii) Exposure to radioactive material; ix) Threat of violence in the workplace; x) Long working hours; xi) Extreme heat xii) Excessive noise xiii) Night shifts b) <u>Ante-natal risk assessment must include:</u> <ul style="list-style-type: none"> i) Working with organic mercury; ii) Working with radioactive materials; 1) Exposure to lead 3) Reasonable accommodation to nursing mothers <ul style="list-style-type: none"> a) Location does not need to be a separate dedicated area b) Location for breastfeeding activities: <ul style="list-style-type: none"> i) Not be a toilet stall or a bathroom ii) Private; iii) Close to the workspace iv) Clean v) Secure vi) Has a water supply (e.g., a sink)? vii) Has access to hygienic storage (e.g. a closed clean cupboard) viii) Breaks for expressing milk (pumping breaks) are not compensated unless paid breaks are used to express milk

Rating:

Priority	Major	Minor	Not Applicable
1. Pregnant workers are present and working with immediate risk to worker and child	One or more of the following is true: 1. No general Policy 2. No risk assessment for pregnant workers and nursing mothers (2 or more elements missing) 3. No reasonable accommodation provided for nursing mothers (2 or more elements missing)	One or more of the following is true: 1. A General Policy is in place but incomplete 2. A risk assessment for pregnant workers and nursing mothers is in place and performed but incomplete (not all elements evaluated or some action incomplete) 3. No reasonable accommodation provided for nursing mothers but does not meet all criteria	1. All male facility/operation
Remote Verification Acceptable:	NO		

B2) Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills. Emergency drills must be executed at least annually or as required by local law whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

B2.1 All required permits, licenses and inspection/testing reports for fire safety response equipment (including fire suppression equipment) and emergency preparedness are in place and a process is implemented to ensure permits and licenses are up to date at all times

Conformance Requirements:

Site Observations	Record Review
Posting of emergency numbers/procedures	1) Process a) A documented process is in place to ensure permits are renewed before current permits expire 2) Records a) All required occupational safety permits and licenses are in place, available for review and valid. b) Occupational safety testing reports are in place, available for review

Additional assistance:

Site Observations	Record Review
	1) Process a) A documented process e.g. a compliance calendar or reminders/tasks/calendar appointments via an e-mail system. 2) Records a) All occupational safety permits and licenses e.g. i) Fire safety and emergency preparedness b) Occupational safety testing reports e.g. i) Fire safety inspection data ii) Emergency preparedness data

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Required permits, licenses or testing reports missing 2. Two or more of minimum requirement elements are missing or ineffective.	One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	No permits or license required. No testing reports required
Remote Verification Acceptable:	YES		

B2.2 Adequate and effective fire detection, alarm and suppression systems are in place.

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Detection <ul style="list-style-type: none"> a) Automatic heat and/or smoke detection as required by insurance company b) Detector devices and system are in function 2) Alarm <ul style="list-style-type: none"> a) All buildings have a manual or automatic fire alarm and notification system b) Fire alarm control system is free of trouble/supervisory signals (trouble/supervisory signals are usually indicated by orange LED lights). c) Fire alarm manual call-points or pull-stations are provided at or along egress routes to exits 3) Fire suppression <ul style="list-style-type: none"> a) Portable fire extinguishers are installed, with unimpeded access b) Fire extinguisher inspection tags c) automatic fire sprinklers as required by insurance company d) Fire hose inspection tag, e) Fire water tank and water pressure are normal 	<ul style="list-style-type: none"> 1) Process <ul style="list-style-type: none"> a) Automatic fire sprinklers (if required by law or insurance company), portable fire extinguishers, heat and smoke detection, and an alarm and notification system are inspected, tested and maintained for good state of operation on a regular basis, as required by insurance company or common practice 2) Records <ul style="list-style-type: none"> a) The inspection frequency for portable fire extinguishers shall not be less than monthly. The inspection frequency for single unit smoke detectors shall not be less than semi-annually. b) Inspection for all other fire safety equipment, testing and maintenance frequency shall not be less than that required/recommended by the manufacturer, local code or insurance company whichever is more stringent c) The inspection, testing and maintenance procedure, frequency and results are documented

Additional assistance:

Site Observations	Record Review
<p>1) Fire suppression</p> <p>a) Normally open sprinkler control valves are locked in fully open position. Fire pumps are set to run automatically. Large ducts or objects do not obstruct sprinkler heads. Fire extinguishers are in their designated locations, fully charged and free of signs of tampering and have evidence (tags) that indicate they have been inspected.</p> <p>b) Asbestos-containing fire-suppression materials—for example, blankets—are prohibited.</p>	<p>1) If an insurance inspection has occurred within the last 12 months, ask to see a copy. Any issues/concerns noted in the insurance inspection report have an agreed corrective action plan. The agreed corrective action plan is on track. Or if off-track additional measures have been identified to bring it back on track.</p>

Rating:

Priority	Major	Minor	Not Applicable
<p>One or more of the following is true:</p> <ol style="list-style-type: none"> No firefighting equipment No sprinkler or automatic detection system (if required) No alarm or notification system is in place Firefighting equipment AND automatic detection system AND alarm or notification systems are in place but $\geq 10\%$ is not functional 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> Firefighting equipment AND automatic detection system AND alarm or notification systems are in place but not inspected, tested and maintained as required by minimum requirements. Firefighting equipment AND automatic detection system AND alarm or notification systems are in place but $<10\%$ is not functional Two or more of minimum requirement elements are missing or ineffective 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> Systems are in place and inspection, testing and maintenance procedures are documented and implemented but the results are not recorded Isolated case of any single component (e.g. fire extinguisher, detector, ...) of the system is not functional however does not represent a systemic failure. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 	<p>Not Applicable</p>
<p>Remote Verification Acceptable:</p>	<p>NO</p>		

B2.3 All potential emergencies that could affect the site are identified and assessed, and effective emergency preparedness and response programs (plans/procedures) are established.

Conformance Requirements:

Site Observations	Record Review
<p>1) Signage</p> <p>a) Adequate and effective signage is observed with emergency number(s), emergency team and emergency plot, evacuation, and response plan.</p> <p>b) Maps are posted throughout the facility which clearly identify exit routes and muster points in the correct orientation</p> <p>2) Muster points</p> <p>a) Muster points have been established in safe locations to enable employee accountability during an emergency.</p> <p>3) Emergency response kits</p> <p>a) Emergency response kits are easily located and accessible near muster points</p>	<p>1) Risk assessment</p> <p>a) Adequate and effective risk assessment process is in place considering</p> <p>i) Harm to life</p> <p>ii) The environment</p> <p>iii) Property</p> <p>b) The risk assessment is current (updated when there is a Significant Change or at least every 3 years)</p> <p>2) Business continuity and resumption</p> <p>a) Business continuity and resumption procedures are available, current and adequate</p> <p>3) Emergency response</p> <p>a) Documented current emergency response plans (ERP) are in place and available for review reflecting the risk assessment, including contact information for emergency responders.</p> <p>b) A post-emergency plan is in place which includes incident reporting, root cause investigation, and corrective/preventative actions.</p> <p>4) Records</p> <p>a) Records are available for review:</p> <p>i) Risk assessment</p> <p>ii) Business continuity and resumption</p> <p>iii) Emergency response</p> <p>iv) CAPs resulting of post emergency evaluation (if applicable)</p>

Additional assistance:

Site Observations	Record Review
1) Muster points a) Muster points will be both <u>inside</u> (tornado/extreme weather shelter-in-place) and <u>outside</u> (fire, chemical release)	1) <u>Current = reflecting the actual situation of the facility/operation</u> 2) Risk assessment a) Risk assessment minimum elements: i) Fire ii) Chemical spill (if large quantity or especially hazardous chemicals are used) iii) Earthquake (if in earthquake zone) iv) Severe weather (rain, flood, typhoon, frost, snow, or other conditions as appropriate to the facility location, ...). v) Workplace violence vi) Strike 3) Emergency response a) ERP minimum elements i) Specific roles ii) Available for review upon request by employees.

Rating:

Priority	Major	Minor	Not Applicable
1. No risk assessment	One or more of the following is true: 1. No emergency response plan (ERP) in place 2. No business continuity and resumption plan in place 3. ERP is in place but not covering all minimum requirements or missing items identified as significant / major risk in risk assessment 4. Risk assessment, business continuity and resumption or ERP are not current 5. Workers unaware of ERP 6. Lack of procedure for notification to outside emergency services 7. Two or more of minimum requirement elements are missing or ineffective	One or more of the following is true: 1. Risk assessment and ERP up to date and complete but no reporting procedure 2. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	Not Applicable
Remote Verification Acceptable:	NO		

B2.4 Effective emergency exit access, exits, and exit discharge are adequate in number and location, readily accessible, and properly maintained

Conformance Requirements:

Site Observations	Record Review
<p>1) <u>Clear and unobstructed egress (i.e. Exit access, exit and exit discharge)</u></p> <ul style="list-style-type: none"> a) An adequate number of effective Exit Routes from every area b) Exit Routes are separated by an appropriate distance and do not share a common exit. c) Exit Routes are clear of obstructions d) Exit Discharges discharge to open space/parking lot, and do NOT discharge to an enclosed/gated/locked area e) Exits are free of material storage; and enclosures are not used for any other purpose except for egress f) All Exit Route doors (i.e. Exit Access doors, Exit Discharge doors) which serve high occupancy (>=50) or hazardous areas; open in the direction of egress. g) All Exit Route doors (i.e. Exit Access doors and Exit Discharge doors) should open without using a key, badge, code, special knowledge, or effort. h) All Exit Discharge doors must <ul style="list-style-type: none"> i) be a single motion exit or ii) have Listed Panic Hardware installed which is pushed open in a single motion <p>2) <u>Exit signs:</u></p> <ul style="list-style-type: none"> a) Exit signs are provided to mark exits on every floor b) Exit signs are illuminated and/or lighted in the event of a power failure c) Additional exit and/or directional signs are provided at main passageways/aisles, long corridors and at other locations where the way to the nearest exit is not clear. <p>3) <u>Emergency lighting:</u></p> <ul style="list-style-type: none"> a) Emergency lighting provided and installed to illuminate means of egress in the event of a power failure. b) Lighting shall provide adequate, functional emergency lighting in stairs, aisles, corridors, ramps, and passageways leading to exits, and in other areas as required by applicable laws. c) Either battery or backup generator may power emergency lighting. <p>4) <u>Separation:</u></p> <ul style="list-style-type: none"> a) Penetrations are limited to sprinkler pipes, standpipes, and electrical services, pipe and duct installation serving the enclosures b) Openings into the enclosures are protected by fire rated doors or window c) Fire doors are in good condition, self-closing or automatic closing (upon fire alarm or detection of smoke) d) Integrity of exit enclosures is maintained 	<p>1) Process</p> <ul style="list-style-type: none"> a) Adequate and effective process in place to ensure effective emergency Exit Access, exits and Exit Discharge with unobstructed egress in in place <p>2) Records</p> <ul style="list-style-type: none"> a) Inspection records for emergency support facilities (emergency lighting, emergency exit signs, evacuation paths, exit enclosures, ...) are maintained and show these are inspected as per insurance requirements, or local practice whichever is stricter.

Additional assistance:

Site Observations	Record Review
<p>1) Non-conforming situations for Exit Route doors (i.e. Exit Access doors and Exit Discharge doors) include:</p> <ul style="list-style-type: none"> a) Multiple steps required to open doors b) Anything requiring a tight grasp c) Rolling doors that open vertically <p>2) On designated Exit Routes, rolling doors shall not be adopted as the designated / marked emergency Exit Doors. On designated Exit Routes, sliding doors shall not be adopted as the designated / marked emergency Exit Doors unless there is a safety feature, to be demonstrated in the audit, which allows the doors to swing to a full-open position in the direction of travel.</p> <p>3) <u>Auditor must follow at least three randomly selected egress routes out of the building to the assembly/muster point</u></p>	

Rating:

Priority	Major	Minor	Not Applicable
<p>One or more of the following is true:</p> <ul style="list-style-type: none"> 1. No emergency support facilities present or in good operating condition throughout Auditee's facility 2. Two (2) or more emergency exits are blocked or lacking easy means of egress as defined in Minimum Requirements (i.e. require key, badge, code, multiple steps or tight grasp or rolling doors) or lack approved panic hardware 	<p>One or more of the following is true:</p> <ul style="list-style-type: none"> 1. One (1) emergency exit blocked or lacking easy means of egress as defined in Minimum Requirements (i.e. require key, badge, code, multiple steps or tight grasp or rolling doors) or Exit Discharge lacking approved Listed Panic Hardware, or are Exit Discharge doors which open inward when not permitted... 2. Emergency support facilities are generally in working condition, however, there is at least one missing component or exception. 3. Emergency support facilities not inspected. 4. Two or more of minimum requirement elements are missing or ineffective 	<p>One or more of the following is true:</p> <ul style="list-style-type: none"> 1. All emergency support facilities are appropriate, in good condition and inspected, however inspection records are not maintained or are incomplete. 2. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 	<p>Not Applicable</p>
<p>Remote Verification Acceptable:</p>	<p>NO unless a Minor with only gaps in records or documentation</p>		

B2.5 Adequate and effective fire and other identified emergency situations and evacuation drills are conducted with all employees, and records are maintained.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ul style="list-style-type: none"> 1) ERP drill plan <ul style="list-style-type: none"> a) Adequate and effective emergency evacuation drill program <ul style="list-style-type: none"> i) Fire ii) Other emergencies b) Emergency drills must be executed at least annually or as required by local law whichever is more stringent c) ERP drill plan must include at minimum <ul style="list-style-type: none"> i) All workers ii) Every area (including dormitory, cafeteria, warehouse, office areas, productions floors, research and development laboratories, shipping/receiving) iii) All work shifts iv) One drill that is conducted at night; while it is dark outside) v) Appropriate frequency (other than fire emergency situations) (frequency determined through the facility risk-assessment see B2.3) 2) Effectiveness evaluation <ul style="list-style-type: none"> a) The effectiveness of each drill should be evaluated and documented b) A Corrective action plan for any deficiencies identified 3) Records <ul style="list-style-type: none"> a) Records are available for the last 3 years <ul style="list-style-type: none"> i) ERP drill plan ii) ERP drill evaluation reports iii) ERP drill CAPs

Additional assistance:

Site Observations	Record Review
	<ul style="list-style-type: none"> 1) Effectiveness evaluation <ul style="list-style-type: none"> a) Effectiveness evaluation includes <ul style="list-style-type: none"> i) Time of the drill ii) Time required to clear the building or otherwise respond to the emergency iii) Any deficiencies identified during the drill 2) Records <ul style="list-style-type: none"> a) Records for last 3 years, including CAP and their status are available for review and spot-checked to ensure corrections are being made and implemented

Rating:

Priority	Major	Minor	Not Applicable
1. No emergency evacuation drill held in last 2 or more years	One or more of the following is true: 1. No emergency evacuation drill held in last year or drill was held but not for all areas and all shifts and at least one drill at night while it was dark outside. 2. Drill was held for all areas and all shifts however post-drill evaluation was not done 3. Drill was held for all areas and all shifts and post-drill evaluation was done but corresponding corrective actions were not determined or documented 4. Two or more of minimum requirement elements are missing or ineffective	One or more of the following is true: 1. Corrective actions from last drilled are off track or not being tracked 2. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	Not Applicable
Remote Verification Acceptable:	YES		

B2.6 Designated emergency response personnel are provided adequate and effective PPE and training on an annual basis

Conformance Requirements:

Site Observations	Record Review
<ol style="list-style-type: none"> 1) Emergency response PPE is available, adequate and in good and working condition. 2) Emergency response PPE storage is clearly marked, visible and easily accessible. 3) Badges, different colored attire/hard-hat, and office/cubicle signage may identify emergency response team personnel 	<ol style="list-style-type: none"> 1) ERT assignment <ol style="list-style-type: none"> a) An emergency response team (ERT) is formed at each facility that shall be available during all working shifts 2) The ERT shall have the obligation and authority to direct the Auditee's response to emergencies to ensure the protection of worker health and safety, the environment, and property 3) ERT qualifications <ol style="list-style-type: none"> a) ERT members have the required qualifications 4) ERT training <ol style="list-style-type: none"> a) Emergency responders are trained on an annual basis. b) Training will be dependent on responsibilities during an emergency c) Training material and training records are available for review and up to date

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) ERT members = workers involved in the control, cleanup and disposal of hazardous materials or other emergency response procedures (e.g. firefighting) 2) It is expected that the facility will have a designated Emergency Response Team (ERT), and this team will have the appropriate PPE for their emergency response duties defined in A2.3 (Emergency response). In some cases, an ERT might not exist, the justification must be available and valid.

Rating:

Priority	Major	Minor	Not Applicable
One or more of the following is true: <ol style="list-style-type: none"> 1. PPE for ERT is not available 2. PPE for ERT is not in good condition / working order, sufficient, visible or easily accessible 3. No ERT in place 	1. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective	1. No ERT requirement
Remote Verification Acceptable:	YES		

B3) Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of workers to work.

B3.1 All required permits, programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times

Conformance Requirements:

Site Observations	Record Review
<p>Required postings are current and located in public view. Some signage and information may be required to be posted in employee common/break/cafeteria locations.</p>	<p>1) Process a) A documented process is in place to ensure permits are renewed before current permits expire</p> <p>2) Records a) All required occupational injury and illness permits and licenses are in place, available for review and valid. b) occupational injury and illness testing reports are in place, available for review c) Government certifications, permits, inspections, approval for the onsite medical treatment facility is available for review</p> <p>3) Medical professional certificates 1) Valid certificates for occupational health are available for review (e.g. first responders ... where required). If nurses or doctors are employed or doctor/nurse services are used, a copy of their certificate/license is available for review</p>

Additional assistance:

Site Observations	Record Review
	<p>1) Process a) A documented process e.g. a compliance calendar or reminders/tasks/calendar appointments via an e-mail system.</p> <p>1) Records a) All occupational safety permits and licenses e.g. i) Occupational health professional licenses b) Occupational safety testing reports e.g. i) Injury logs ii) Respiratory protection (fit tests, medical evaluations) iii) Hearing conservation programs iv) Notice of availability of medical records</p>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Required permits, programs, licenses or testing reports missing 2. Two or more of minimum requirement elements are missing or ineffective	One of minimum requirement elements is missing or ineffective	No permits, programs, license or testing reports required. No testing reports required.
Remote Verification Acceptable:	YES		

B3.2 Investigations to determine root cause(s) and implement corrective/preventive actions for work-related injuries/illness in the past three years are performed and documented, communicated to affected employees, and tracked to closure.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Reporting <ol style="list-style-type: none"> a) A system for workers to report health and safety incidents and near misses, as well as a system to investigate, track, and manage such reports. b) All reportable and non-reportable accidents are tracked; documented and investigated to minimize the potential for future occurrence. c) Occupational Injury and illness data for last 3 years are available for review including surveillance data 2) Analysis <ol style="list-style-type: none"> a) All accidents are investigated and analyzed for corrective and preventive actions b) Trend analysis of the occupational Injury and illness data is performed on a regular basis, at least annually and corrective actions are identified 3) Preventive Action <ol style="list-style-type: none"> a) Corrective and preventive actions following accident investigation or trend analysis were implemented (or are on track) and verified as effective b) If a worker has abnormal medical surveillance results or is injured immediate appropriate preventive action will be taken

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) Surveillance data= pre-job, on-the-job, post-job, and post-emergency medical data 2) Review number and type of first aid events, number and type of injuries beyond first aid, and any fatalities. 3) Appropriate preventive action as a result of medical surveillance or injury: <ol style="list-style-type: none"> a) Worker shall be removed from the current job immediately and offered another position in the facility. b) Auditee is prohibited from terminating the labor contract with the worker due to the medical surveillance results. c) Auditee shall provide medical treatment to the worker. d) Auditee shall provide re-examination to the worker. e) Auditee shall cover the medical treatment, re-examination, and rehabilitation cost for the worker.

Rating:

Priority	Major	Minor	Not Applicable
1. Reportable occupational accidents, injuries and illnesses are not reported to the governing agency as required by law	One or more of the following is true: 1. No accidents, injury and illness are tracked or incomplete records for last 3 years. 2. Accidents are tracked but no analysis, investigation or corrective actions. 3. Two or more of minimum requirement elements are missing or ineffective	One or more of the following is true: 1. Accidents, injuries, illnesses tracked, analyzed and prevented but no formal procedure 2. Corrective actions are off track 3. One of minimum requirement elements is missing or ineffective	1. No injuries, accidents or illnesses in the past 3 years.
Remote Verification Acceptable:	YES		

B3.3 An effective first aid process and adequate number of first responders are available to provide initial medical treatment for injured or ill workers is in place

Conformance Requirements:

Site Observations	Record Review
<ol style="list-style-type: none"> 1) First Aid responders are easily identifiable by badges, colored attire, office/work area signage 2) If applicable, an occupational medical clinic is adequately staffed and supplied to respond to injuries 3) If the medical clinic is not open or operated 24 hours per day, alternative resources such as outside medical services are communicated to employees 	<ol style="list-style-type: none"> 1) Policy <ol style="list-style-type: none"> a) Adequate and effective first response policies and procedures are in place indicating severity of medical emergency and response (first aid, infirmary, local external hospital). 2) First Responders <ol style="list-style-type: none"> a) The facility assigns a team of trained/certified first responders. 3) In-house infirmary or clinic: <ol style="list-style-type: none"> a) An operations log of onsite emergency occupational medical clinic is available and up to date (access might be restricted due to privacy laws). b) Documented procedures and supplies for the onsite occupational medical clinic are available and adequate.

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) Policy <ol style="list-style-type: none"> a) Injured workers are then sent to off-site medical facilities for further treatment. 2) First Responders <ol style="list-style-type: none"> a) It is possible that the role of trained/certified first responders is performed by onsite medical professional team 3) <u>If first responders do not have adequate training, then list the finding in B8 or B2.6 if they are part of the ERT.</u>

Rating:

Priority	Major	Minor	Not Applicable
1. No first responders or procedures	One or more of the following is true: 1. First aid, occupational medical clinic or first response procedures are inadequate 2. Occupational medical clinic has inadequate supplies, staffing or access 3. Percentage of first responders is $\geq 10\%$ below the legal required number of first responders	1. One of the minimum requirements is missing or ineffective 2. Percentage of first responders is $< 10\%$ below the legal required number of first responders.	Not Applicable
Remote Verification Acceptable:	YES		

B3.4 Adequate first response equipment and first aid kits to provide medical treatment for injured or ill workers are available to employees in designated areas. The kits have adequate supplies and are inspected on a monthly basis.

Conformance Requirements:

Site Observations	Record Review
1) First Aid kits <ul style="list-style-type: none"> a) Appropriate and completely stocked placed /assigned first aid kits are available in designated locations. b) First aid kits are unlocked or if locked, first responder can access the key at all times. 2) First Response Equipment <ul style="list-style-type: none"> a) Appropriate and well maintained first response equipment is available in designated locations. 	1) Maintenance procedure <ul style="list-style-type: none"> a) Adequate and effective maintenance procedure is in place for inspection, maintenance, upkeep and stocking of all first response equipment and first aid kits b) Frequency is at least monthly for all inspections 2) Records <ul style="list-style-type: none"> a) First aid kits have inventory list b) Inspection tracking records are available and up to date.

Additional assistance:

Site Observations	Record Review
	First response equipment = e.g. fire blanket, eye wash, emergency shower, ...

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: <ul style="list-style-type: none"> 1. First aid kits are inadequate 2. First response equipment is inadequate 3. No stated process for access to First Aid kits during all times of operation 4. Inspection schedule is not followed 	One or more of the following is true: <ul style="list-style-type: none"> 1. First aid kits are adequate and stocked but contents list missing 2. First response equipment is adequate, but inspection log is missing 3. First Aid kits inspection tracking records missing 	Not Applicable
Remote Verification Acceptable:	YES		

B4) Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. If any potential hazards were identified, participants shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

B4.1 All required permits, licenses and testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times

Conformance Requirements:

Site Observations	Record Review
Not applicable	1) Process a) A documented process is in place to ensure permits are renewed before current permits expire 2) Records a) All required industrial hygiene permits and licenses are in place, available for review and valid. b) Industrial hygiene testing reports are in place, available for review Industrial hygiene sampling records for the past three years, including sampling performed by government agencies as part of a regulatory inspection are available for review.

Additional assistance:

Site Observations	Record Review
	1) Process a) A documented process e.g. A compliance calendar or reminders/tasks/calendar appointments via an e-mail system. 1) Records a) All industrial hygiene permits and licenses e.g. i) Use permits b) Industrial hygiene testing reports e.g. c) Industrial hygiene monitoring logs

Rating:

Priority	Major	Minor	Not Applicable
No health risk evaluation process has been implemented	One or more of the following is true: 1) Required permits, licenses or testing reports missing 2) Two or more of minimum required elements are missing or ineffective	One of minimum requirement elements is missing or ineffective	No permits or license required. No testing reports required.
Remote Verification Acceptable	YES		

B4.2 Adequate and effective process to be identify, evaluate, and control, according to the hierarchy of controls, worker exposure to chemical, biological and physical agents .

Conformance Requirements

Site Observations	Record Review
<p>1) Adequate controls to reduce or eliminate worker exposure to chemical, biological and physical agents are in place and effective including:</p> <ul style="list-style-type: none"> a) Proper design (elimination and/or substitution) b) Engineering controls c) Administrative controls d) Adequate and effective PPE <p>2) During normal working hours, workplace is free from obvious odor, visible fume, dust, and other conditions leading to potential unhealthy feelings</p>	<p>1) Process</p> <ul style="list-style-type: none"> a) Adequate and effective risk assessment process to identify, evaluate, and control, according to the hierarchy of controls, worker exposure to chemical, biological and physical agents . b) The risk assessment is updated when a Significant Change occurs c) Risk assessment must include exposure to multiple chemicals d) A health risk assessment with associated industrial hygiene sampling and testing, is completed when a new chemical, biological, or physical agent is introduced into the work environment, or when an existing process is changed that may trigger an employee health risk. <p>2) Control program</p> <ul style="list-style-type: none"> a) Regular evaluation plan to verify the effectiveness to implemented controls and corrective actions if required. The frequency should at least every 3 years unless a major change requires re-evaluation <p>3) Records</p> <ul style="list-style-type: none"> a) Medical surveillance records are available for review pertaining to respiratory evaluations to determine if worker is being harmed from exposure to agents or determining hearing loss or any other medical concerns related to specific job activities.

Additional assistance:

Site Observations	Record Review
1) Engineering controls = e.g. exhaust ventilation, enclosures, ... 2) Administrative controls = limiting worker exposure time; job rotation, ... 3) <u>If obvious odor, visible fume, dust, and other conditions leading to potential unhealthy feelings exist, auditor should perform detail interview and inspections.</u>	1) Risk assessment a) Hierarchy of hazard control is a system used in industry to minimize or eliminate exposure to hazards. These are from most effective to least effective: 1. Elimination, 2. Substitution, 3. Engineering controls, 4. Administrative controls, 5. PPE b) Exposure to multiple chemicals is an exposure to multiple chemicals by a single route and exposure to multiple chemicals by multiple routes. A route can inhalation, ingestion, skin exposure, ... c) <u>Significant Change can be the introduction, elimination or change of 1 chemical</u> 2) Records a) Surveillance records are not limited to respiratory, but various exposures, such as skin contact, hearing loss, radiation, 3) <u>A PPE finding is noted in B1.3</u>

Rating:

Priority	Major	Minor	Not Applicable
One or more of the following is true: 1. No health risk assessment or control measures are in place 2. Potential hazards are evident	One or more of the following is true: 1. Potential hazards have been identified and risk assessment program is in place, but controls are inadequate. 2. Two or more of minimum requirement elements are missing or ineffective	One or more of the following is true: 1. Potential hazards are controlled and minimized but documentation and records are incomplete or does not follow the hierarchy of controls 2. No consideration of combined exposure to multiple chemicals	Not applicable Not applicable
Remote Verification Acceptable:	NO		

B5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

B5.1 Worker exposure to the hazards of physically demanding work is identified, assessed, communicated and controlled effectively

Conformance Requirements:

Site Observations	Record Review
1) Adequate controls to reduce or eliminate physical demanding work are in place and effective including: <ul style="list-style-type: none"> a) Proper design b) Engineering controls c) Administrative controls 	1) Risk assessment <ul style="list-style-type: none"> a) Adequate and effective risk assessment is in place to identify and assess the potential hazards of physical demanding work. b) The risk assessment is updated when a Significant Change occurs 2) Control program <ul style="list-style-type: none"> a) Adequate and effective documented program to control the identified potential hazards of physical demanding work is in place and follows the hierarchy of controls b) Program encourages and respond to early reporting of discomfort.

Additional assistance:

Site Observations	Record Review
1) Physical demanding work=e.g. Heavy or repetitive lifting, prolonged standing, ... 2) Engineering controls=e.g. Palletizers, lift tables, adjustable work platforms, ... 3) Administrative controls=e.g. limiting worker exposure time; job rotation, ...	1) Control program <ul style="list-style-type: none"> a) A review and trend analysis of past 3 years of injuries related to physical demands of job duties. b) If there are no changes to the facility or work set up, there is no need to re-assess (this "no-change" should be documented). c) Periodic ergonomic task analyses

Rating:

Priority	Major	Minor	Not Applicable
1. No risk assessment or control measures are in place AND high frequency of physically demanding work is evident	1. Physically demanding work has been identified and risk assessment program is in place, but controls are inadequate	1. Physically demanding work is controlled and minimized, AND physically demanding work monitoring program is adequate, but documentation is incomplete	No physically demanding work
Remote Verification Acceptable:	NO		

B6) Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

B6.1 All required permits, licenses and testing reports for machinery are in place and a process is implemented to ensure permits and licenses are always up to date

Conformance Requirements:

Site Observations	Record Review
Required postings are current and located in public view.	1) Process a) A documented process is in place to ensure permits are renewed before current permits expire 2) Records a) All required machine safety permits and licenses are in place, available for review and valid. b) machine safety testing reports are in place, available for review

Additional assistance:

Site Observations	Record Review
Some signage and information may be required to be posted in employee common/break/cafe/cafeteria locations.	1) Machines in scope are machine operated by workers to perform their main task. Machine which are part of building or utilities (elevators, lifts, hoists, boilers, compressors) fall under B1. 2) Process a) A documented process e.g. A compliance calendar or reminders/tasks/calendar appointments via an e-mail system. 3) Records a) All machine (safety) permits and licenses e.g. i) Machine permits b) Machine (safety) testing reports e.g. i) Machine testing logs

Rating:

Priority	Major	Minor	Not Applicable
Not applicable	One or more of the following is true: 1. Required permits, licenses or testing reports missing 2. Two or more of minimum requirement elements are missing or ineffective	One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited.	No permits or license required. No testing reports required.
Remote Verification Acceptable:	YES		

B6.2 An adequate and effective machine-safeguarding program is implemented, and workers operate machinery safely

Conformance Requirements:

Site Observations	Record Review
1) Emergency stops a) All machines have adequate emergency stops 2) Safeguards a) All machines have adequate safeguards 3) Operation a) All workers operate machine safely.	1) Machine risk assessment a) Adequate and effective documented machine risk assessment process is in place including: b) Machine risk assessment program provides a method to identify machine safeguarding needs (pre-purchase/pre-installation hazard review of all machinery.) 2) Control program a) Appropriate method is used to ensure that safeguarding is installed as needed to control the identified hazards, b) Regular inspection and preventive maintenance of machine and its safeguards and emergency stops. 3) Work instructions a) Work instructions (if necessary or required) are available in a language understood by the worker at machine (or within proximity). b) Safe machine operation documentation is in place and available.

Additional assistance:

Site Observations	Record Review
Machine safeguards=e.g. machine pinch points, points-of-operation, rotating shafts, flywheels, chain drives, motor-driven movement, ...	1) Machine = any equipment with at least one moving part. Machines in scope are machine operated by workers to perform their main task. Machine which are part of building or utilities (elevators, lifts, hoists, boilers, compressors) fall under B1. 2) Control program a) Records demonstrating regular inspection and preventive maintenance of machine are available for review (3years)

Rating:

Priority	Major	Minor	Not Applicable
1. Worker operates machine unsafely with immediate risk of life or limb	1. Worker operates machine unsafely without immediate risk of life or limb	1. Workers operate machines safely, but work instructions are incomplete 2. Machine safeguarding program is in place but incomplete	1. No physical machine hazards
Remote Verification Acceptable:	YES, if minor, otherwise NO.		

B7) Food, Sanitation and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Auditee or a labor agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

B7.1 All required health & safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up to date at all times

Conformance Requirements:

Site Observations	Record Review
Valid hygiene permit is placed on site (if applicable)	1) A documented process is in place to ensure permits are renewed before current permits expire 2) Records a) All required food, sanitation and housing permits and licenses are in place, available for review. b) Food, sanitation and housing testing reports are in place, available for review.

Additional assistance:

Site Observations	Record Review
	1) Process a) A documented process e.g. a compliance calendar or reminders/tasks/calendar appointments via an e-mail system. 2) Records a) Rented apartments must be permitted by the local government b) food, sanitation and housing permits and licenses e.g. i) Canteen/kitchen workers have valid health certificates. c) food, sanitation and housing testing reports e.g. i) Drinking water ii) Food worker health tests iii) Food sample testing d) If local regulations require facility health inspections or other tests or certificates, these are available and valid. 3) Drinking water a) Water must be tested for those contaminants assessed to be at risk for the local region and operations. Drinking water testing is not required if local water utility company can attest water meets World Health Organization (WHO) Guidelines for Drinking-water Quality or equivalent standard If drinking water is not a separate system or no additional contamination can take place (e.g. filters, ...) then report only in B1.1

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Required permits, licenses or testing reports are missing 2. Canteen/kitchen worker certificates are missing or expired 3. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	All of the following is true: 1. No permits or license required 2. No testing reports required 3. There is no dormitory, restaurant/canteen at the facility.
Remote Verification Acceptable:	YES		

B7.2 Dormitories, bathrooms, employee spaces are clean, safe and well-maintained and meet international housing standards

Conformance Requirements:

Site Observations	Record Review
<p>1) Environment</p> <ul style="list-style-type: none"> a) Dormitory and sanitary facilities (common areas, hallways, rest rooms, ...) are clean and properly maintained. b) Clear, well-lit stairwells to allow for safe exit from dormitories c) Building is heated in the winter (if applicable). d) Windows provide light and ventilation. e) Adequate lighting f) Safe and sufficient electricity sockets are provided. g) Sufficient space is available for each worker h) Individually secured storage accommodations <p>2) Structure and lay-out</p> <ul style="list-style-type: none"> a) All facilities are separated by gender and adequate in number. b) Lodging and cooking facilities are separate c) Adequate domestic waste disposal facilities d) Adequate pest control <p>3) Emergency response</p> <ul style="list-style-type: none"> a) Adequate fire and heat detection, alarm and notification and fire suppression systems are in place b) Adequate number of exit routes from each floor. c) Exit route doors accessible, well-marked and unlocked from the inside d) Adequate number of first kits are available 	<p>1) Procedures</p> <ul style="list-style-type: none"> a) Adequate and effective cleaning and sanitation program is in place. b) Adequate and effective pest control program is in place c) Adequate and effective preventive maintenance program (including emergency response supporting facilities) is in place d) For rented apartments, performs a risk assessment and updates if there is a Significant Change, on-site inspections and emergency procedures <p>2) Records</p> <ul style="list-style-type: none"> a) Sanitation program tracking records are available for review and up to date. b) Pest control log is available for review and up to date. c) Preventive maintenance program logs available for review and up to date.

Additional assistance:

Site Observations	Record Review
<ol style="list-style-type: none"> 1) Adequate lighting = lighting is adequate for reading, writing and other off-work activities 2) individually secured storage accommodations = storage for personal and valuable items protected from unauthorized access and accessible to the workers at any time 3) Exit route doors unlocked from the inside = doors may be locked from the outside only if panic hardware, such as crash bars, are used 4) <u>The dormitory requirements shall apply regardless of the nature of contract /location /building (for example if rooms are rented by the facility in nearby residential areas for housing employees, these standards will still apply</u> 	

Rating:

Priority	Major	Minor	Not Applicable
<ol style="list-style-type: none"> 1. Dormitory/rented apartments is/are unsafe with immediate risk of loss of facility, life or limb 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. Dormitory and sanitary facilities are unclean or do not minimum requirements (except documentation) 2. Rented apartments are unsafe 3. Rented apartments did not have a risk assessment or inspection No emergency drills in rented apartments 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. Dormitory and sanitary facility are safe, clean and adequate but procedures or records are missing or incomplete. 2. Rented apartments are safe, clean and adequate but on-site inspections are irregular 	<ol style="list-style-type: none"> 1. No worker housing.
<p>Remote Verification Acceptable:</p>	<p>NO</p>		

B7.3 Facility Bathrooms, employee spaces, cafeterias, food areas are safe, are clean, well maintained, and well managed

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Environment <ul style="list-style-type: none"> a) Bathrooms, employee spaces, cafeterias, food areas are safe, clean and well maintained. b) Exits must be adequate for the number of workers served. c) Canteens are provided with adequate hand washing facilities. d) Adequate pest control 2) Food workers <ul style="list-style-type: none"> a) Food service workers wear masks, hairnets and gloves as necessary to prevent food contamination. 3) Emergency response <ul style="list-style-type: none"> a) Adequate fire and heat detection, alarm and notification and fire suppression systems are in place b) Adequate number of exit routes from each floor. c) Exit route doors accessible, well-marked and unlocked from the inside d) Maximum occupancy number is posted on site e) Adequate number of first kits are available 4) Food storage: <ul style="list-style-type: none"> a) Food storage and preparation areas are clean b) Food is stored properly (not on the floor; refrigerated if necessary) c) Raw and cooked food stored separately, food kept covered, ... d) Food is used or disposed of before the marked expiration date 	<ul style="list-style-type: none"> 1. Procedures <ul style="list-style-type: none"> 1) Safe food handling procedures and hygiene standards (in refrigeration, storage, and preparation areas) are in place and followed. 2) Adequate and effective cleaning and sanitation program is in place. 3) Adequate and effective pest control program is in place 4) Adequate and effective preventive maintenance program (including emergency response supporting facilities) is in place 5) Records <ul style="list-style-type: none"> a) Regular monitoring and reporting of safe food handling procedures/hygiene b) Sanitation program tracking records are available for review and up to date. c) Pest control log is available for review and up to date. d) Preventive maintenance program logs available for review and up to date.

Additional assistance:

Site Observations	Record Review

Rating:

Priority	Major	Minor	Not Applicable
1. Canteen and kitchen are unsafe with immediate risk of loss of facility, life or serious injury	One or more of the following is true: 1. Canteen and kitchen are unclean 2. Canteen and kitchen do not meet minimum requirements on canteen/cafeteria standards 3. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	Not applicable
Remote Verification Acceptable:	NO		

B8) Health and Safety Communication

Participant shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

B8.1 Workers are provided with appropriate clearly posted workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to. Workers shall be encouraged to raise **any health and safety concerns without retaliation**

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Health and Safety communication clearly posted in the facility or placed in a location identifiable and accessible by workers 2) Appropriate signs, placards and labels identifying hazards (chemical, physical, biological, vehicular, ...) 3) A mechanism to raise safety concerns is clearly visible 	<ul style="list-style-type: none"> 1) Language <ul style="list-style-type: none"> a) All communications and training must be in a language understood by the worker 2) Training: <ul style="list-style-type: none"> a) Adequate and effective training program is in place following good training program practice b) Training program has minimum requirements (mechanical, electrical, chemical, fire, and physical hazards) training and training identified in the training needs assessment but must include <ul style="list-style-type: none"> i) The correct use of appropriate PPE ii) Types of potential emergencies that may occur at their work location and what to do during an emergency, including Internal and external muster points. iii) Machine safety and the use of safeguards and emergency stops. iv) Reporting injuries and illnesses v) Hazardous atmospheres and confined space work procedures prior to entry of confined spaces vi) Lock out-tag out procedures vii) Specific training for ERT, first responders and medical professionals c) Training is provided to all workers prior to the beginning of work and regularly thereafter as per the training program. d) Workers responsible for storage, clean up or disposal of chemical releases should receive specialized training. e) Occupational health professionals and first responders are trained by external agencies or trained and certified by internal qualified occupational health professionals such as medical doctor where permitted by local law 3) Communication: <ul style="list-style-type: none"> a) Adequate and effective communication program to workers/employees is in place for all identified b) Potential workplace hazards that workers are exposed to clearly posted in the facility or placed in a location identifiable and accessible by workers c) Hazard communication procedure: all hazards present at the site and action promoting of an H&S workplace. d) Internal and external muster points are communicated to all employees and visitors 4) Health and safety concern notification <ul style="list-style-type: none"> a) Adequate and effective program to receive, review and respond to any health and safety concerns reported. (e.g. incentive systems, ...). b) Workers shall be encouraged to raise any health and safety concerns without retaliation 5) Evaluation <ul style="list-style-type: none"> a) The training, communication and safety concern notification programs must be evaluated on a regular basis not exceeding 3 years or sooner if there is a major change 6) Records <ul style="list-style-type: none"> a) Training records include a verification of training effectiveness b) Safety concern logs, evaluation records and action plans c) Communication records, logs and materials

	<ul style="list-style-type: none"> d) Training, communication and safety concern notification evaluation reports and corrective action if required e) Educational materials (e.g. safe work instruction, operating instruction, ...) about the risks associated with the hazards for their positions are provided to workers to ensure safe execution of the function. Examples of controls include personal protective equipment (safety glasses, gloves, and ear plugs), operating procedures (lock-out/tag-out, chemical mixing), and engineering controls (ventilation, point of operation machine guarding, building sprinkler systems). f) Girevance records show health and safety concerns, their response and no retaliation
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Additional assistance:

Site Observations	Record Review
	<ul style="list-style-type: none"> 1) Good training program practice <ul style="list-style-type: none"> a) H&S training needs analysis is conducted and is documented b) A training matrix has been developed following the training needs analysis (including but not limited to mechanical, electrical, chemical, fire, and physical hazards) c) A training plan is in place, building on the training matrix d) A training program with materials and training records is in place, adequate and up to date. e) Training program is up to date and maintained through a compliance calendar, work-order systems, and computer-based e-mail/calendar system. f) Refresher training schedules are established and implemented as per schedule Communication: g) Updates should be made whenever new operations, chemicals, machines or process are added in the facility or change significantly Records Verification of training effectiveness=e.g. demonstrate that workers have understood training and aims of training are achieved (through a post training test, or worker interviews on the training) 2) <u>ERT member training must be reported in B2.6</u>

Rating:

Priority	Major	Minor	Not Applicable
1. No training and/or communication program in place	1. Training and communications program in place but major hazards or program components missing 2. No training provided on one or more of the minimum elements: chemicals, hazardous substances (including waste), PPE, emergency evacuation, machinery safety, reporting injuries 3. Two or more of minimum requirement elements are missing or ineffective 4. No system in place to raise safety concerns 5. First responder training does not meet minimum requirements in content or number	1. Training and communications program in place but communications are not updated in accordance with developed schedule or training records/verification incomplete	Not Applicable
Remote Verification Acceptable:	NO		

4. C. ENVIRONMENT

Participants recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

GENERAL NOTES

- A risk assessment must be updated if there is a Significant Change.
- For facilities with significant EHS risks an EHS expert Auditor will be added to the audit team for an expert review of these policies, programs, and performance.
- Where monitoring, testing, audits or other assessments are required and law, licenses or permits are silent on the frequency, then the frequency must not exceed three years unless there are significant changes to the process, facility or product use

C1) Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

C1.1 The facility has obtained all required environmental permits, approvals, licenses and registrations

Conformance Requirements:

Site Observations	Record Review
1) Any unidentified impacts to: <ul style="list-style-type: none"> a) Air emissions b) Wastewater discharge c) Storm water exposure d) Hazardous materials storage and use e) Generation of waste (solid and hazardous) 	1) Process <ul style="list-style-type: none"> a) A documented process is in place to ensure permits, approvals, registrations or licenses are renewed before current permits, approvals, registrations or licenses expire 2) Records <ul style="list-style-type: none"> a) All required environmental permits, approvals, registrations and licenses are in place, available for review and valid.

Additional assistance:

Site Observations	Record Review
	1) Process <ul style="list-style-type: none"> a) A documented process e.g. a compliance calendar or reminders/tasks/calendar appointments via an e-mail system. b) Any alteration that may change the status of registration and permitted hazardous-waste generation to the appropriate local and national regulatory agencies 2) Records <ul style="list-style-type: none"> a) Environmental permits, approvals registrations and licenses e.g. <ul style="list-style-type: none"> i) Operating permit ii) Air emissions iii) Wastewater discharge iv) Storm water exposure v) Hazardous materials storage and use vi) Generation of waste (solid and hazardous) b) Current copies of all hazardous waste vendor licenses and/or approvals are on file.

Rating:

Priority	Major	Minor	Not Applicable
Not applicable	One or more of the following is true: 1. Required permits, licenses or testing reports missing 2. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	1. No permits, approvals, registrations or license required.
Remote Verification Acceptable:	YES		

C1.2 Reporting to environmental authorities as required by law is performed timely.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Process a) A documented process is in place to ensure reports are submitted before or on due date is in place 2) Records a) Environmental testing reports are in place, available for review and meeting the conditions of permits or licenses

Additional assistance:

Site Observations	Record Review
	1) Process a) A documented process e.g. a compliance calendar or reminders/tasks/calendar appointments via an e-mail system. 2) Records a) Environmental testing reports e.g. i) Air emissions ii) Water emissions iii) Waste iv) Hazardous waste

Rating:

Priority	Major	Minor	Not Applicable
1. Mandatory government reporting is late for more than 3 months	1. Required reports missing, incomplete AND no process in place to ensure legally required reports are submitted in a timely manner	One or more of the following is true: 1. Required reports submitted but no process in place to ensure legally required reports are submitted in a timely manner 2. Required reports submitted in a timely manner but incomplete	1. No environmental reporting required
Remote Verification Acceptable:	YES		

C2) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water fossil fuels, minerals and virgin forest products is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

C2.1 Adequate and effective programs, including objectives and targets, to identify, manage, minimize or eliminate at the source emissions and discharges of pollutants and generation of waste and conserve the use of natural resources

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Policy <ul style="list-style-type: none"> a) Adequate and effective programs to identify, manage, minimize or eliminate at the source emissions and discharges of pollutants, generation of waste and conserve the use of natural resources including: <ul style="list-style-type: none"> i) Materiality assessment: identify significant environmental aspects and establish programs for monitoring and control of these aspects. ii) Clear annual objectives and targets are set for each identified material emission source, waste including hazardous waste and natural resource used demonstrating annual progress not entailing excessive cost <ul style="list-style-type: none"> (1) Reduce resource consumption (2) Reduce waste and pollution generation (3) Capture or reuse materials that would otherwise enter waste streams 2) Records <ul style="list-style-type: none"> a) Materiality assessment (updated when changes in machinery, process or materials used or facility) b) Data for each material emission and discharge of pollutants, waste and natural resource

Additional assistance:

Site Observations	Record Review
	1) Elimination or minimization e.g. by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. 2) Natural resources = e.g. Water fossil fuels, minerals and virgin forest products 3) Conservation of the use of natural resources e.g. By practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means. 4) Reduction programs are implemented where they don't present increased worker harm or excessive cost 5) The goal of this provision is to confirm that a facility has done a materiality assessment and understands its materials resource use and environmental impacts <u>and has set clear annual objectives to reduce this impact.</u> 6) The implementation of the programs to meet these reduction objectives are covered in the individual environmental media provisions C3, C4, C5, C7 and C8.

Rating:

Priority	Major	Minor	Not Applicable
1. Reduction programs cause potential worker harm	One or more of the following is true: <ul style="list-style-type: none"> 1. No assessment of resource use and waste generation has been completed 2. No selection processes for all new hazardous chemicals 3. No reduction objectives set 4. Two or more of minimum requirement elements are missing or ineffective 	One or more of the following is true: <ul style="list-style-type: none"> 1. Assessment of resource use and waste generation is incomplete 2. Selection processes for all new hazardous chemicals is incomplete 3. Reduction objectives set but incomplete for a material component 4. One of minimum requirement elements are missing or ineffective 	Not Applicable

Remote Verification Acceptable:	YES
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C3) Hazardous Substances

Chemical, waste and other materials posing a hazard to humans or to the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

C3.1 Hazardous substances including wastes are properly categorized, labeled, handled, stored and transported and disposed using government-approved and/or licensed vendors.

Conformance Requirements:

Site Observations	Record Review
<p>1) Management</p> <ul style="list-style-type: none"> a) Hazardous substances are adequately and effectively <ul style="list-style-type: none"> i) Categorized ii) Handled iii) Stored iv) Moved <u>within</u> a single facility/ multiple facility. <p>2) Control</p> <ul style="list-style-type: none"> a) Access to hazardous substances is controlled b) Potential employee exposure methods are adequate and effective such as <ul style="list-style-type: none"> i) Segregation ii) Secondary containment iii) Ventilation iv) Fire protection v) Appropriate storage cabinets <p>3) Hazard information</p> <ul style="list-style-type: none"> a) Hazard signage and information [labels and safety data sheet (SDS formally MSDS) or characterization in the case of hazardous waste] 	<p>1) Policy</p> <ul style="list-style-type: none"> a) Adequate and effective procedures are in place for <ul style="list-style-type: none"> i) Reception ii) Storage iii) Dispensing iv) Use b) Adequate and effective process to track, review, and approve the use of all hazardous chemicals and shall obtain approvals for all new purchases of hazardous chemicals prior to use. c) Selection processes for all new hazardous chemicals include a thorough evaluation of less hazardous or non-hazardous alternatives. <p>2) Hazard information (Environmental)</p> <ul style="list-style-type: none"> a) Hazardous material information [labels and safety data sheet (SDS formally MSDS)] or characterization in the case of hazardous waste) is available at the points of use and storage in a language understood by the worker. <p>3) Records</p> <ul style="list-style-type: none"> a) Accurate chemical inventory records are maintained and available for review. b) Inspection records of hazardous substances and their points of storage and use are maintained and available for review. c) Copies of hazardous substances inventory, manifests and shipping papers are maintained and available for review. d) Documents only vendors approved and/or licensed by the local regulatory authorities for transporting are used.

Additional assistance:

Site Observations	Record Review
<p>1) Engineering and administrative systems intended to improve resource efficiency are in good repair or operating at high capacity.</p> <p>2) Engineering and administrative systems for improved resource efficiency adhere to the hierarchy of resource efficiency when feasible, showing preference (in order) for the following functions:</p> <ul style="list-style-type: none"> a) Prevention: unnecessary consumptive processes are eliminated b) Minimization: Process efficiency is improved c) Substitution: Using a more environmentally benign or renewable resource d) Reuse, recycling, recovery: In that order, in order to maximize the benefit of resource consumption <p>3) <u>Hazard information (Health & Safety) finding should be noted in B8</u></p>	<p>1) Records</p> <ul style="list-style-type: none"> a) Copies of hazardous substances inventory, manifests and receiving shipping papers e.g. may be related to: <ul style="list-style-type: none"> i) Air emissions; ii) Process wastewater storage; iii) Hazardous materials storage and use; and iv) Hazardous waste storage <p>2) <u>Hazard information (Health & Safety) finding should be noted in B8</u></p>

Rating:

Priority	Major	Minor	Not Applicable
<p>1. Hazardous substances (including wastes) are used, handled or stored of in a manner that could result in imminent loss of facility, life or cause severe bodily damage.</p>	<p>1. Two or more of minimum requirement elements are missing or ineffective</p>	<p>1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited</p>	<p>1. No hazardous substances (including wastes) used or stored on site.</p>
<p>Remote Verification Acceptable:</p>	<p>YES</p>		

C3.2 Hazardous waste is safely disposed of including a disposal Supplier(s) assessment

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Policy <ol style="list-style-type: none"> a) Adequate and effective procedures are in place for the safe return and disposal of hazardous waste. 2) Reduction program <ol style="list-style-type: none"> a) An adequate and effective reduction program with <ol style="list-style-type: none"> i) Annual objectives ii) Regular objective tracking iii) Progress monitoring iv) Adjustments made if off track 3) Hazard information (Environmental) <ol style="list-style-type: none"> a) Hazardous material information [labels and safety data sheet (SDS formally MSDS)] or characterization in the case of hazardous waste) is available at the points of use and storage in a language understood by the worker. 4) Vendor assessment <ol style="list-style-type: none"> a) A periodic assessment and corrective action plan process to evaluate whether the vendor (hazardous waste handler AND transporter) is complying with contract terms and conditions b) Assessments should occur at least every 3 years or when there is a significant change c) The assessment must occur before a new vendor (hazardous waste handler AND transporter) is selected 5) Records <ol style="list-style-type: none"> a) Documents that only vendors approved and/or licensed by the local regulatory authorities for transporting and disposing of hazardous waste are used b) Assessments visit minutes or Audit reports, with possible areas for improvement are available for review. c) Copies of hazardous waste shipping papers d) Annual reduction targets, progress monitoring and corrective actions plans if applicable

Additional assistance:

Site Observations	Record Review
	1) Assessment a) If corrective or improvement actions are identified, then implementation is monitored, and actions are completed or on track. b) If corrective actions are off track, then additional actions are identified to ensure corrective actions are completed by due date. 2) <u>Objective setting finding is listed in C2.1</u> 3) <u>Auditor guidance: Reporting on this question will include the detail of the current targets and current progress against the targets</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Environmental emissions are evident that could cause imminent negative impact on the community (toxic air and water emissions, untreated wastewater release, chemicals spill on hazardous substances released outside the facility, ...)	One or more of the following is true: 1. No control programs in place and there is a risk of environmental emissions 2. No baseline to reduce environmental impacts 3. No hazardous waste vendor assessment 4. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented	1. No hazardous chemical waste generated or stored on site.
Remote Verification Acceptable:	YES		

C4) Solid Waste

Participant shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste (non-hazardous).

C4.1 Solid waste is managed and responsibly disposed of

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Management <ul style="list-style-type: none"> a) Waste is adequately and effectively <ul style="list-style-type: none"> i) Categorized ii) Handled iii) Stored iv) Moved <u>within</u> a single facility/ multiple facility. 2) Facilities Control <ul style="list-style-type: none"> a) Access to waste is controlled b) Potential employee exposure methods are adequate and effective such as <ul style="list-style-type: none"> i) Segregation ii) Secondary containment iii) Ventilation iv) Fire protection 3) Hazard information <ul style="list-style-type: none"> a) Hazard signage and information and waste characterization and response information 4) Reduction programs are visible within the facility. 	<ul style="list-style-type: none"> 1) Policy <ul style="list-style-type: none"> a) Adequate and effective procedures are in place for <ul style="list-style-type: none"> i) Storage ii) Handling iii) Transportation iv) Disposal. b) Adequate and effective process to track, review, and approve the disposal of all waste 2) Reduction program <ul style="list-style-type: none"> a) An adequate and effective reduction program with <ul style="list-style-type: none"> i) Annual objectives ii) Regular objective tracking iii) Progress monitoring iv) Adjustments made if off track 3) Hazard information (Environmental) <ul style="list-style-type: none"> a) Material information [labels and safety data sheet (SDS formally MSDS)] or characterization in the case of waste) is available at the points of use and storage in a language understood by the worker. 4) Records <ul style="list-style-type: none"> a) Accurate waste inventory records are maintained and available for review. b) Inspection records of waste and their points of storage are maintained and available for review on site. c) Copies of waste manifests and shipping papers are maintained and available for review. d) Documents only vendors approved and/or licensed by the local regulatory authorities for transporting are used. e) Annual reduction targets, progress monitoring and corrective actions plans if applicable

Additional assistance:

Site Observations	Record Review
1) Engineering and administrative systems intended to improve resource efficiency are in good repair or operating at high capacity. 2) Engineering and administrative systems for improved resource efficiency adhere to the hierarchy of resource efficiency when feasible, showing preference (in order) for the following functions: a) Prevention: unnecessary consumptive processes are eliminated b) Minimization: Process efficiency is improved c) Substitution: Using a more environmentally benign or renewable resource d) Reuse, recycling, recovery: In that order, in order to maximize the benefit of resource consumption	1) <u>Objective setting finding is listed in C2.1</u> 2) <u>Hazard information (Health & Safety) finding should be noted in B8</u> 3) <u>Auditor guidance: Reporting on this question will include the detail of the current targets and current progress against the targets</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Environmental emissions are evident that could cause imminent negative impact on the community (toxic air and water emissions, untreated wastewater release, chemicals spill on hazardous substances released outside the facility, ...)	One or more of the following is true: 1. No control programs in place and there is a risk of environmental emissions 2. No baseline to reduce environmental impacts 3. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented	1. No solid waste generated or stored on site.
Remote Verification Acceptable:	YES		

C5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance to the Montreal Protocol and applicable regulations. Participant shall conduct routine monitoring of the performance of its air emission control systems.

C5.1 Air emissions are routinely monitored, and air emission control systems are routinely monitored for performance.

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Equipment <ul style="list-style-type: none"> a) Equipment for air emission treatment is well maintained and appropriate and identified 2) Treatment <ul style="list-style-type: none"> a) Air emission are treated prior to discharge in accordance with permit requirement 3) Reduction programs are visible within the facility. 4) Ozone depleting substances are clearly labeled 	<ul style="list-style-type: none"> 1) Policy <ul style="list-style-type: none"> a) Adequate and effective procedures are in place for air emissions <ul style="list-style-type: none"> i) Treatment ii) Discharge b) Adequate and effective process to track, review, and approve the discharge of all air emissions c) Emergency response actions are defined in case the on-site air emissions treatment system malfunctions d) Ozone depleting substances are managed in accordance to the Montreal Protocol and applicable regulations. 2) Reduction program <ul style="list-style-type: none"> a) An adequate and effective reduction program with <ul style="list-style-type: none"> i) Annual objectives ii) Regular objective tracking iii) Progress monitoring iv) Adjustments made if off track 3) Equipment <ul style="list-style-type: none"> a) Appropriate process air emission treatment systems are installed and maintained that minimize the pollutant contribution of each of its facilities include: <ul style="list-style-type: none"> i) A routine preventive maintenance program ii) System efficiency monitoring program iii) A program to evaluate the integrity of existing process air emission systems 4) Personnel: <ul style="list-style-type: none"> a) A specific individual or individuals within the facility organization who will be responsible for all aspects of process air emission treatment 5) Records <ul style="list-style-type: none"> a) Inspection records of air emission and their points of discharge are maintained and available for review. b) Testing and reporting records are maintained and available for review c) Revise the inventory after any changes to the production or process that are likely to affect air emissions d) List of air emissions and Ozone Depleting Substances is up to date and accurate

Additional assistance:

Site Observations	Record Review
<p>1) Engineering and administrative systems intended to improve resource efficiency are in good repair or operating at high capacity.</p> <p>2) Engineering and administrative systems for improved resource efficiency adhere to the hierarchy of resource efficiency when feasible, showing preference (in order) for the following functions:</p> <ul style="list-style-type: none"> a) Prevention: unnecessary consumptive processes are eliminated b) Minimization: Process efficiency is improved c) Substitution: Using a more environmentally benign or renewable resource d) Reuse, recycling, recovery: In that order, in order to maximize the benefit of resource consumption 	<p>1) Equipment:</p> <ul style="list-style-type: none"> a) A program to evaluate the integrity of existing process air emission treatment systems: <ul style="list-style-type: none"> i) Regularly test of the air emission system ii) Correct any identified deficiencies immediately <p>2) Personnel</p> <ul style="list-style-type: none"> a) Wastewater treatment responsibilities include: <ul style="list-style-type: none"> i) Maintenance ii) Inspection of air emission treatment equipment iii) Monitoring of air emissions iv) Responding to emergencies <p>3) Ozone depleting substances are substances or materials containing Chlorofluorocarbons (CFCs), Hydrochlorofluorocarbons (HCFCs), Hydrobromofluorocarbons (HBFCs), Halons, Methyl bromide, Carbon tetrachloride and Methyl chloroform. They can mostly be found in refrigerants, foam blowing agents, components in electrical equipment, industrial solvents, solvents for cleaning (including dry cleaning, Aerosol spray propellants, fumigants</p> <p>4) Auditor guidance: Reporting on this question will include the detail of the current targets and current progress against the targets</p>

Rating:

Priority	Major	Minor	Not Applicable
<p>1. Environmental emissions are evident that could cause imminent negative impact on the community (toxic air and water emissions, untreated wastewater release, chemicals spill on hazardous substances released outside the facility, ...)</p>	<p>One or more of the following is true:</p> <ul style="list-style-type: none"> 1. Air emissions are not complying with discharge requirement 2. Workers responsible for operating and maintaining air emission treatment systems are untrained 3. Monitoring is not carried out on a regular basis 4. No baseline to reduce environmental impacts 5. Two or more of minimum requirement elements are missing or ineffective 	<p>1. One of minimum requirement elements is missing or ineffective</p>	<p>1. No air emissions - site does not have requirements for air emissions.</p>
Remote Verification Acceptable:	YES		

C5.2 Environmental noise levels are within regulatory limits

Conformance Requirements:

Site Observations	Record Review
1) No excessive boundary noise	1) Policy <ul style="list-style-type: none"> a) Adequate and effective procedures are in place for environmental noise control including boundary noise sources are <ul style="list-style-type: none"> i) Identified ii) Evaluated iii) Routinely monitored iv) Controlled b) Adequate and effective process to track and review environmental noise 2) Equipment <ul style="list-style-type: none"> a) Appropriate boundary-noise-control devices are installed and maintained to control boundary noise levels include: <ul style="list-style-type: none"> i) A routine preventive maintenance program ii) System efficiency monitoring program iii) A program to evaluate the integrity of existing boundary-noise-control devices 3) Personnel: <ul style="list-style-type: none"> a) A specific individual or individuals within the facility organization who will be responsible for all aspects of environmental noise control 4) Records <ul style="list-style-type: none"> a) Testing and reporting records are maintained and available for review

Additional assistance:

Site Observations	Record Review
	1) Boundary noise levels are evaluated per the permit conditions, upon changes to "Receiving Land Use Category" in the neighborhood of the facility, or if there are any community noise complaints and boundary noise-level criteria are set accordingly. 2) Personnel <ul style="list-style-type: none"> a) Environmental noise control responsibilities include: <ul style="list-style-type: none"> i) Maintenance ii) Inspection of boundary-noise-control devices iii) Monitoring of boundary noise iv) Responding to emergencies

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	1. Site does not have requirements on environmental noise
Remote Verification Acceptable:	YES		

C6) Materials Restrictions

Participants are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

C6.1 Adequate and effective program is in place for Materials Restrictions as a formal part of the procurement and manufacturing processes

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Corporate level implementation <ol style="list-style-type: none"> a) Documented corporate policy b) Documented corporate process c) Assigned responsibility d) Proof of implementation 2) Facility level (in case no corporate level implementation) <ol style="list-style-type: none"> a) Policy <ol style="list-style-type: none"> i) Adequate and effective procedures to measure and/or document the chemical composition of products including: <ol style="list-style-type: none"> (1) A documented review process for comparing customer requirements to own specifications (2) A documented process to ensure materials, packaging and components procured are in conformance with customer requirements (3) Documented requirements for conformance with the Material Restrictions required to its material /parts Suppliers ii) Statements and/or certificates of conformance and analytical data to its customers upon request are provided b) Records <ol style="list-style-type: none"> i) Chemical composition of products is on record ii) specifications, statements and/or certificates of conformance from its Suppliers iii) Monitoring & reporting records from the past 3 years are available and ready for review

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) Policy <ol style="list-style-type: none"> a) A documented process to ensure materials, packaging and components procured are in conformance with customer requirements <ol style="list-style-type: none"> i) Regular audits and assessments of the procedures are performed to verify conformance. ii) A formal process is in place to address discovery of non-compliant materials or components and corrective actions are tracked, implemented. iii) Additional actions taken to ensure completion at due date if corrective actions are not on track. iv) Analytical data from material/parts Suppliers is requested/required

Rating:

Priority	Major	Minor	Not Applicable
<p>1. No program is in place AND product has been subject to regulatory action</p>	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. No program is in place 2. Two or more of minimum requirement elements are missing or ineffective 3. The responsibility could be shared corporate and facility then complete the relevant section 1 and/or 2 <ol style="list-style-type: none"> a. If implementation is done at corporate level then verify 1), if not complete then "Major" b. if implementation at facility level then verify 2) c. If implementation at both levels then verify 1) and 2) then the highest of both rating apply 	<p>1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited</p>	<p>1. Site is not subject to any requirements or customer demands on this topic.</p>
<p>Remote Verification Acceptable:</p>	<p>YES</p>		

C7) Water Management

Participant shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Participant shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

C7.1 Adequate and effective procedures are in place to document, characterize, and monitor water sources, water discharge and control channels of contamination

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Water withdrawal <ul style="list-style-type: none"> a) Water withdrawal and discharge points don't appear to heavily impact local waterbodies (e.g. strongly colored discharge, acrid smell, floating debris). 2) Water discharge <ul style="list-style-type: none"> a) Equipment <ul style="list-style-type: none"> i) Equipment such as tanks, piping, and storage vessels are compatible with the waste materials being stored and transported. b) Treatment <ul style="list-style-type: none"> i) Industrial and/or sanitary wastewater is treated in accordance with permit requirements. ii) Wastewater treatment system is in operation and appears based on visual inspection to be operating effectively. c) Discharge <ul style="list-style-type: none"> i) Wastewater is discharged to a municipal treatment system or to surface water 3) Reduction programs are visible within the facility. 4) Control of internal water channel contamination <ul style="list-style-type: none"> a) Internal water channels <ul style="list-style-type: none"> i) Water channels look free of contamination ii) Water channels are protected from contamination (e.g. Absence of pools of standing water and grease/oil slicks near storm drains.) b) Emergency response <ul style="list-style-type: none"> i) Appropriate emergency response equipment / materials are in place to respond to a possible water channel contamination 	<ul style="list-style-type: none"> 1) Water withdrawal <ul style="list-style-type: none"> a) The source of water is clear b) A baseline of water use and adequate and effective annual reduction plan is implemented with objectives and corrective action plans if the implementation is off track. c) Annual reduction program should not harm workers or entail excessive cost. 2) Water discharge <ul style="list-style-type: none"> a) Policy <ul style="list-style-type: none"> i) Adequate and effective procedures are in place for wastewater <ul style="list-style-type: none"> (1) Storage (2) Treatment (3) Discharge b) Adequate and effective process to track, review, and approve the discharge of all wastewater c) Emergency response actions are defined in case the on-site wastewater treatment system exceeds its capacity or if it malfunctions d) Hazard information <ul style="list-style-type: none"> i) Wastewater characterization and response information is available at the points of use and storage in a language understood by the worker. e) Equipment <ul style="list-style-type: none"> i) Appropriate process wastewater treatment systems are installed and maintained that minimize the pollutant contribution of each of its facilities include: <ul style="list-style-type: none"> (1) A routine preventive maintenance program (2) System efficiency monitoring program (3) A program to evaluate the integrity of existing process wastewater collection systems 3) Control of internal water channel contamination <ul style="list-style-type: none"> a) Adequate and effective procedures to control internal water channel contamination including: b) Potential contamination sources to water channels are identified c) Adequate and effective emergency response plan to control water channel contamination d) Appropriate emergency response equipment inspection and maintenance process e) Investigation of past spills/water channel contamination and corrective/preventive action plan 4) Personnel <ul style="list-style-type: none"> a) At least one responsible for all aspects of process wastewater discharge including treatment, water channel contamination prevention and water-related emergency response and reporting activities 2) Records <ul style="list-style-type: none"> a) Identified water channel contamination sources b) Description of spills/water channel contamination for past 3 years c) Preventive/corrective action plan for past spills/contamination d) Additional actions taken to ensure completion at due date if corrective actions are not on track.

	<ul style="list-style-type: none"> e) Accurate wastewater inventory records are maintained and available for review. f) Inspection records of wastewater and their points of storage are maintained and available for review. g) Copies of wastewater manifests and shipping/discharge papers are maintained and available for review. h) Documents only vendors approved and/or licensed by the local regulatory authorities for transporting are used. a) Annual reduction targets, progress monitoring and corrective actions plans if applicable
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Additional assistance:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Engineering and administrative systems intended to improve resource efficiency are in good repair or operating at high capacity. 2) Engineering and administrative systems for improved resource efficiency adhere to the hierarchy of resource efficiency when feasible, showing preference (in order) for the following functions: <ul style="list-style-type: none"> a) Prevention: unnecessary consumptive processes are eliminated b) Minimization: Process efficiency is improved c) Substitution: Using a more environmentally benign or renewable resource d) Reuse, recycling, recovery: In that order, in order to maximize the benefit of resource consumption 	<ul style="list-style-type: none"> 1) Water withdrawal <ul style="list-style-type: none"> a) Source of water = on-site (e.g. Surface withdrawal, aquifer via well) or off-site via municipal or private company service b) Good practice is to understand where the municipal or private company service withdraws its water c) Good practice: A water risk assessment that considers competitive use, water quality, and scarcity has been conducted in the last 3 years for the facility's location using reference tools such as: <ul style="list-style-type: none"> i) WWF Water Risk Filter, ii) WRI Aqueduct, iii) WBCSD Global Water Tool iv) The Water Footprint Assessment Tool v) GEMI Local Water Tool 2) Water discharge <ul style="list-style-type: none"> a) Equipment: <ul style="list-style-type: none"> i) A program to evaluate the integrity of existing process wastewater collection systems: b) Regularly test of the process wastewater system c) Correct any identified deficiencies immediately 3) Personnel <ul style="list-style-type: none"> a) Wastewater treatment responsibilities include: <ul style="list-style-type: none"> i) Maintenance ii) Inspection of Wastewater Treatment Plant (WWTP) iii) Monitoring of wastewater discharge iv) Responding to emergencies 4) <u>Objective setting finding is listed in C2.1</u> 5) <u>Hazard information (Health & Safety) finding should be noted in B8</u> 6) <u>Auditor guidance: Reporting on this question will include the detail of the current targets and current progress against the targets</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Environmental emissions are evident that could cause imminent negative impact on the community (toxic air and water emissions, untreated wastewater release, chemicals spill on hazardous substances released outside the facility, ...)	One or more of the following is true: 1. Person responsible for water is untrained. 2. No control programs in place and there is a risk of environmental emissions 3. No baseline to reduce environmental impacts 4. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective	Not Applicable
Remote Verification Acceptable:	NO		

C8) Energy Consumption and Greenhouse Gas Emissions

Participants are to establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked, documented and publicly reported against the greenhouse gas reduction goal. Participants are to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

C8.1 Energy consumption and all relevant Scopes 1 and 2 Greenhouse gas (GHG) emissions are tracked, documented and publicly reported against the corporate greenhouse gas reduction goal

Conformance Requirements:

Site Observations	Record Review
<p>1) Greenhouse Gas emissions</p> <p>a) There is no significant energy consumption or GHG emissions at the facility that are not tracked and documented</p>	<p>1) Corporate level implementation</p> <p>a) Documented corporate policy</p> <p>b) GHG Reduction goal</p> <p>c) Documented corporate process</p> <p>d) Assigned responsibility</p> <p>e) Proof of implementation</p> <p>2) Facility level (in case no corporate level implementation)</p> <p>a) Energy consumption</p> <p>i) A baseline of energy use (by source)</p> <p>ii) The sources of electricity and other energy are documented, consumption recorded and accurate by source</p> <p>(1) On-site combustion: oil, coal, diesel, natural gas, propane, garbage, etc.</p> <p>(2) Copies of records of total quantity of fuel combusted on-site (or easily extrapolated from fuel bills and other purchased fuel records)</p> <p>(3) Purchased electricity</p> <p>(4) Renewable energy use -If facility purchases renewable energy through their utility company</p> <p>b) Scope 1 and 2 Greenhouse Gas emissions are documented, consumption recorded and accurate by source and with a description of its boundary</p> <p>3) Public reporting</p> <p>a) Publicly report a corporate-wide* GHG footprint (total scopes 1 & 2) as a quantitative value of total emissions. A percentage (e.g., 90% of last year's emissions) is unacceptable.</p> <p>b) Value must represent annual emissions.</p>

Additional assistance:

Site Observations	Record Review
<p>1) On-site combustion (incinerators, diesel generators, burning of waste on-site), purchased electricity (un-metered electricity consumption at the facility), significant leakage of refrigerants (from HVAC units or other refrigeration equipment), or other GHG-generating production processes (cfcs and hfcs from solvents and foams, for example).</p>	<p>1) Corporate wide* = reflecting at least a significant majority (e.g. 90-95%) of corporate owned operations</p> <p>2) Definitions</p> <p>a) GHG = greenhouse gases such as carbon dioxide, methane, water vapor, and nitrous oxide but also include the chlorofluorocarbons (cfcs), hydrofluorocarbons (hfcs) and Perfluorocarbons (pfc), as well as sulfur hexafluoride (SF6)</p> <p>b) Scope 1 GHG emissions are all direct GHG emissions</p> <p>c) Scope 2 GHG emissions are all indirect GHG emissions from consumption of purchased electricity, heat or steam. This does <u>not</u> include transportation, waste generated in operations, travel, commuting, use or end of life product treatment (Scope 3 GHG emissions)</p> <p>3) Records</p> <p>a) Documentation on GHG emissions</p> <p>i) On-site combustion: oil, coal, diesel, natural gas, propane, garbage, ...</p>

	<ul style="list-style-type: none"> ii) Copies of records of total quantity of fuel combusted on-site over the previous calendar year should be available for review or should be easily extrapolated from fuel bills and other purchased fuel records. iii) Purchased electricity iv) Renewable energy use –If facility purchases renewable energy through their utility company, this should be documented as well. <ul style="list-style-type: none"> b) Description of boundary defined for reporting (such as: financial control, operational control, or equity share) c) Description of how energy consumption and other GHG sources are converted into GHG emissions using internationally accepted GHG protocol <p>4) Auditor guidance: Reporting on this question will include the detail of the current targets and current progress against the targets</p>
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Rating:

Priority	Major	Minor	Not Applicable
Not applicable	<ol style="list-style-type: none"> 1. Energy and fuel consumption data is not tracked, or significantly incomplete AND no Scopes 1 and 2 GHG emissions data is available for the facility or company. 2. The responsibility could be shared corporate and facility then complete the relevant section 1 and/or 2 <ol style="list-style-type: none"> a. If implementation is done at corporate level then verify 1), if not complete then "Major" b. if implementation at facility level then verify 2) c. If implementation at both levels then verify 1) and 2) then the highest of both rating apply 	<ol style="list-style-type: none"> 1. Facility and company have energy and fuel consumption data but do not calculate their GHG emissions 	<ol style="list-style-type: none"> 1. Facility does not directly pay for fuel or electricity (energy consumption is paid for and managed by building owner, and not reported to company). For example, if company is tenant in fully serviced leased building, it is expected that company will at least make a good faith effort to obtain this data, or effectively estimate for the purposes of GHG reporting.
Remote Verification Acceptable:	YES, unless significant energy consumption or GHG emissions that are not documented are discovered on-site.		

C8.2 Cost-effective methods to improve energy efficiency and to minimize their energy consumption and all relevant Scopes 1 and 2 greenhouse gas (GHG) emissions are implemented.

Conformance Requirements:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) Technology or management strategies to minimize energy consumption and GHG emissions are visible. 2) Reduction programs are visible within the facility. 	<ul style="list-style-type: none"> 1) Reduction program <ul style="list-style-type: none"> a) An adequate and effective reduction program with <ul style="list-style-type: none"> i) Annual objectives ii) Regular objective tracking iii) Progress monitoring iv) Adjustments made if off track b) The programs must be structured with roles and responsibilities, written procedures, targets, monitoring and reporting. 2) Records <ul style="list-style-type: none"> a) Accurate energy and GHG emissions inventory records are maintained and available for review. b) Inspection records of energy and GHG emissions and their points of use are maintained and available for review.

Additional assistance:

Site Observations	Record Review
<ul style="list-style-type: none"> 1) This could include: <ul style="list-style-type: none"> a) Building automation technology, programmable thermostats, lighting controls, or energy-efficient heating, cooling, lighting, and ventilation technology b) Use of on-site combustion or vehicles that are fuel efficient or use a less GHG--intensive source (natural gas, electric, cellulosic ethanol, ...). c) Purchasing or installing on-site renewable energy d) Use of high-efficient collection/treatment systems to absorb/treat cleaning agents e) Use of refrigerants with low global warming potential (GWP) in Heating, Ventilation, and Air Conditioning (HVAC) systems 	<ul style="list-style-type: none"> 1) Procedures to effectively manage energy consumption (may include a "start-up, shut-down" procedure for the facility, staging for boilers and chillers,) if the facility is large or complex enough to warrant these procedures

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. Company has made no discernable effort to identify opportunities to minimize energy consumption and GHG emissions.	1. Company has made some investments or plans to improve energy efficiency and GHG emissions but has not documented these energies and GHG emissions reductions.	1. Company does not pay for fuel or energy consumed on-site.
Remote Verification Acceptable:	NO		

5. D. ETHICS

D1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Participants shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

D1.1 Adequate and effective policy and procedures to uphold the highest standards of integrity in all business interactions with a zero tolerance to any and all forms of bribery, corruption, extortion and embezzlement.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ul style="list-style-type: none"> 1) Policy <ul style="list-style-type: none"> a) Adequate and effective policy and procedures to uphold the highest standards of integrity in all business interactions with a zero tolerance to any and all forms of bribery, corruption, extortion and embezzlement 2) Investigation and sanctions <ul style="list-style-type: none"> a) Adequate and effective monitoring program <ul style="list-style-type: none"> i) a program to regularly monitor its business to ensure: <ul style="list-style-type: none"> (1) Workers or agents do not make or accept improper offers, bribes or undue/improper advantage (2) records verifying is not falsified and accurate. (3) fair business, advertising and competition (4) protection of identity and retaliation (5) protection of personal information b) Appropriate investigation process when there is an alleged violation including misrepresentation by workers, managers and their agents. c) Appropriate sanctions when a violation is confirmed/proven and preventive action plan d) Adequate and effective procedure is in place to protect workers/employees from retribution for refusing to do anything in Non-conformance with the "highest standard of integrity" policy and communicate/volunteer their decision. 3) Records <ul style="list-style-type: none"> a) Investigation reports on alleged violations b) Sanctions in personnel files for proven/confirmed violations and preventive action plan c) Personnel files leave records and disclosure records confirms no negative consequence for any worker/employee refusing to do anything in Non-conformance with the "highest standard of integrity" policy d) Confirmation in personnel records that the policy was communicated in an understandable form

Additional assistance:

Site Observations	Record Review
	1) <u>ALL Ethics investigation and sanctions findings must be listed in this AC</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Confirmed case of Ethics breach (all of D section) without investigation or corrective action plan or corrective action plan not implemented) excluding deliberately misleading documents which is listed in D3.1)	1. No detailed and understandable policy and procedures implemented 2. Confirmed case has been documented and investigated but no progress has been made to implement corrective action	One or more of the following is true: 1. Partial policy or procedures or implementation 2. Confirmed case without completed corrective action plan within the timeline specified in the procedures and / or policy.	Not Applicable
Remote Verification Acceptable:	NO		

D2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

D2.1 No identified risk or evidence of bribes or obtaining undue or improper advantage being promised, offered, authorized, given or accepted.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Policy <ul style="list-style-type: none"> a) Adequate and effective procedures are in place that ensure: <ul style="list-style-type: none"> i) <u>Gifts</u>: Gifts to or from suppliers and customers is not excessive in cost and frequency. ii) <u>Bribes</u>: Bribes or other methods of obtaining undue or improper advantage are not being promised, offered, authorized, given or accepted. iii) <u>Conflict of interest</u> encourages workers/employees to declare conflicts of interest b) Ensure compliance with anti-corruption laws 2) Records <ul style="list-style-type: none"> a) Declarations of conflict of interest are recorded.

Additional assistance:

Site Observations	Record Review
	1) If labor agents are used, then these procedures also need to be implemented at the labor agent level. 2) <u>Investigation and sanctions findings must be listed in D1.1</u>

Rating:

Priority	Major	Minor	Not Applicable
1. Confirmed case of bribery, improper advantage, corruption, extortion, or embezzlement with no corrective action plan.	1. No detailed and understandable gift or similar policy and procedures implemented	1. Partial policy) or procedures or implementation	Not Applicable
Remote Verification Acceptable:	YES		

D3) Disclosure of Information

All business dealings should be transparently performed and accurately reflected on Participant's business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

D3.1 No identified risk or evidence of misreporting, record falsification, misrepresentation or evidence of communicating inaccurate information to the public

Conformance Requirements:

Site Observations	Record Review
1) If publicly communicated company information is posted then it is accurate	1) Policy <ul style="list-style-type: none"> a) Public information must not make false or misleading statements about the Auditee's products, services, opportunities, position, b) Formal program to ensure public Auditee statements are not false or misleading Adequate and effective procedures to <ul style="list-style-type: none"> i) <u>Record</u>: Ensure that all business dealings should be transparently performed and accurately reflected on Participant's business books and records ii) <u>Inspect</u>: Inspect/assess/audit records verifying they are not falsified and accurate. iii) <u>Investigate</u>: investigate misrepresentation by workers, managers and their agents.
	2) Records <ul style="list-style-type: none"> a) Financial and annual reports about the Auditee's business operations are available and ready for review b) Inspection and investigation records are available for review

Additional assistance:

Site Observations	Record Review
	1) Scope: <ul style="list-style-type: none"> a) Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. b) Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable c) Unintentional errors are out of scope for this question.
	2) Records <ul style="list-style-type: none"> a) Examples <ul style="list-style-type: none"> i) E.g. Good accounting policies, procedures, and record keeping, internal controls to ensure the accuracy of information ii) E.g. Annual periodic third-party financial audit to confirm that accounts are in order
	3) <u>Auditors will cross check a number of different business records to ensure records align and are accurate.</u>
	4) <u>NOTE</u> : Includes all kinds of publicly communicated company information (job posting, product details, company/facility promotion (booklet/flyer), commercial advertising, press releases, website, ...)

Rating:

Priority	Major	Minor	Not Applicable
1. Documents are deliberately misleading	1. No detailed and understandable policy and procedures implemented	1. Partial policy or procedures or implementation	Not Applicable
Remote Verification Acceptable:	YES		

D4) Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights and customer and supplier information is to be safeguarded.

D4.1 No identified risk or evidence of Intellectual Property or business information loss or unauthorized disclosure (the Auditee's own and that of their customers/suppliers)

Conformance Requirements:

Site Observations	Record Review
1) Is IP and business information visibly protected	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policy and program is in place to review and protect <ul style="list-style-type: none"> i) The information received from suppliers, customers as part of the contracting process. ii) IP ownership and ensure protection of IP 2) IT measures <ul style="list-style-type: none"> a) Guidelines about the distribution/dissemination of information to protect information from suppliers and customers and IP 3) Contracts <ul style="list-style-type: none"> a) Non-disclosure agreement (separate or part of employment contract) for workers and management is in place

Additional assistance:

Site Observations	Record Review
	1) Information from suppliers and customers could include: <ul style="list-style-type: none"> a) Names and contact information for key customer personnel b) Contract pricing and volumes c) Names of sub-contractors and materials/components suppliers, ... d) Their identities and trademarks e) Third-Party Intellectual Property (IP) f) Patent records g) Copyright-protected content. 2) <u>Customers could include channel partner and other business relationships</u> 3) <u>Suppliers could include representatives, agents, sub-contractors and other business relationships</u> 4) <u>Investigation and sanctions findings must be listed in D1.1</u>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. No detailed and understandable policy and procedures implemented	1. Partial policy or procedures or implementation	Not applicable
Remote Verification Acceptable:	YES		

D5) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld.

D5.1 No identified risk or evidence of non-conformance with fair business, advertising and competition standards

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policy and procedures ensuring fair business, advertising and competition standards are upheld including <ul style="list-style-type: none"> i) Safeguards are in place to prevent collusion with other companies on product pricing or other factors that could reduce competition ii) Monitoring procedures related to fair business, advertising and competition are in place

Additional assistance:

Site Observations	Record Review
	1) <u>Investigation and sanctions findings must be listed in D1.1</u>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. No detailed and understandable policy and procedures implemented	1. Partial policy or procedures or implementation	Not Applicable
Remote Verification Acceptable:	YES		

D6) Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained unless prohibited by law. Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

D6.1 No identified risk or evidence of retaliation or reduced protection of identity

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policy and procedures ensuring protection of identity and non-retaliation are in place including <ul style="list-style-type: none"> i) Safeguards are in place to prevent reduced protection of identity and retaliation ii) Monitoring procedures related to protection of identity and retaliation are in place b) Adequate and effective policy and procedures to ensure protection of Whistleblowers and/or users the of the grievance mechanism(s) (internal and external)

Additional assistance:

Site Observations	Record Review
	1) <u>Investigation and sanctions findings must be listed in D1.1</u> 2) <u>Findings on grievance mechanisms (internal and external) are listed in E8.1</u>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. No detailed and understandable policy and procedures implemented	1. Partial policy or procedures or implementation	Not Applicable
Remote Verification Acceptable:	YES		

D7) Responsible Sourcing of Minerals

Participants shall adopt a policy and exercise due diligence on the source and chain of custody of tantalum, tin, tungsten and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Cooperation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

D7.1 Adequate and effective Conflict Minerals policy and management program that is designed and implemented to reasonably assure that the tantalum, tin, tungsten and gold (3TG) in the products they manufacture are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (OECD Due Diligence Guidance) or an equivalent and recognized due diligence framework.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ul style="list-style-type: none"> 1) Policy <ul style="list-style-type: none"> a) Adequate and effective Supply Chain Policy and Management System that is designed and implemented to reasonably assure the 3TG in the products they manufacture are sourced in a way consistent with the OECD Due Diligence Guidance or an equivalent and recognized due diligence framework. The policy must: <ul style="list-style-type: none"> i) Be communicated to suppliers and the public. ii) Cover all 3TG included in the company's products Commit the company to exercise due diligence on the source and chain of custody of minerals in accordance with the OECD Due Diligence Guidance 2) Corporate level implementation <ul style="list-style-type: none"> a) Documented corporate policy b) Documented corporate process c) Assigned responsibility d) Proof of implementation <ul style="list-style-type: none"> (1) Reviewing the Management System, on an annual basis, to ensure conformance and improve where process improvements have been identified 3) Facility level (in case no corporate level implementation) <ul style="list-style-type: none"> a) Management System requirements <ul style="list-style-type: none"> i) The facility shall implement the Supply Chain Policy and Management System within its own operation(s), including: <ul style="list-style-type: none"> (1) Identifying a senior management person responsible for implementation of the Management System (2) Including 3TG due diligence sourcing requirements in written agreements and/or contracts with suppliers. (3) Mitigate any risks identified in accordance with the OECD Due Diligence Guidance, including the suspension or termination of business relationships with suppliers when risk mitigation is unsuccessful 4) Records <ul style="list-style-type: none"> a) Maintaining records related to conflict minerals due diligence for a minimum of five (5) years b) Annual review and improvement plan (if applicable) c) Mitigation plans with suppliers if any risk is identified 5) Additional actions taken to ensure completion at due date if mitigation actions are not on track.

Additional assistance:

Site Observations	Record Review
	<p>1) The responsibility could be shared corporate and facility then complete the relevant section 2 and/or 3</p> <p>a) If implementation is done at corporate level then verify 2), if not complete then "Major"</p> <p>b) if implementation at facility level then verify 3)</p> <p>c) If implementation at both levels then verify 2) and 3) then the highest of both rating apply</p> <p>2) Publicly communicated=e.g. posted to the company's website (include URL), contained within a Corporate Responsibility Report, and/or Supplier Code of Conduct or other official public company communications.</p> <p>3) Serious human rights abuses=defined in annex II of the OECD Due Diligence guidance</p> <p>4) Conflict minerals= Tantalum, Tin, Tungsten and Gold or 3TG</p> <p>5) Covered Countries= Democratic Republic of the Congo (DRC) and adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia</p> <p>6) <u>For rating, documentation means supplier request and two follow up requests are made if no information is received.</u></p>

Rating:

Priority	Major	Minor	Not Applicable
<p>1. Confirmed purchasing of minerals from conflict sources in the Covered Countries and no documented action taken by auditee to address the issue.</p>	<p>1. No existence of clear Conflict Free Minerals policy and/or Conflict Minerals and management system, more than 25% of 3TG sources do not have a due-diligence and documentation in place</p>	<p>1. Less than 25% of 3TG sources do not have a due-diligence and documentation in place</p>	<p>1. No Tin, Tungsten, Tantalum and Gold (3TG) mineral material or containing components</p>
<p>Remote Verification Acceptable:</p>	<p>NO</p>		

D8) Privacy

Participants are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

D8.1 No identified risk or evidence of unauthorized disclosure of personal information

Conformance Requirements:

Site Observations	Record Review
1) Personal information is visibly protected	1) Policy <ul style="list-style-type: none"> a) Adequate and effective policy and procedures ensuring protection of personal information are in place including <ul style="list-style-type: none"> i) Safeguards are in place to prevent unauthorized disclosure of personal information ii) Monitoring procedures related to protection of personal information are in place

Additional assistance:

Site Observations	Record Review
	1) <u>Scope:</u> <ul style="list-style-type: none"> a) Everyone Auditee does business with, including suppliers, customers, consumers and employees. b) Requirements apply when personal information is <ul style="list-style-type: none"> i) Collected ii) Stored iii) Processed iv) Transmitted v) Shared. 2) <u>Investigation and sanctions findings must be listed in D1.1</u>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. No detailed and understandable policy and procedures implemented	1. Partial policy or procedures or implementation	Not Applicable
Remote Verification Acceptable:	YES		

6. E. MANAGEMENT SYSTEM

E1) Company Commitment

Corporate social and environmental responsibility policy statements affirming Auditee's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the language of the workers or in a language the workers can understand.

E1.1 Adequate and effective policies/Code(s) that are endorsed by executive management, covering: A) Labor B) Health & Safety C) Environment and D) Ethics.

Conformance Requirements:

Site Observations	Record Review
1) Corporate social and environmental responsibility policy statements in a language understood by each worker is visible to all workers	1) Statement/Code signed/endorsed by the highest-level manager at the facility or company with a stated commitment to regulatory compliance and other requirements and commitment to continuous improvement 2) The policy statement is appropriate for the nature and scope of the facility's operations.

Additional assistance:

Site Observations	Record Review
	1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. if a valid ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System) 2) The executive endorsement of the code can be absent when policy/Code is publicly displayed (e.g. intra or internet site). 3) Operating Procedures: Accurate and transparent disclosure of information (example: accuracy of company records, accurate reporting in books and records, disclosed in accordance with law / prevailing industry practices) 4) For Ethics, items/principles in BOLD must be covered at a minimum in at least one of their code of business ethics, standards of business conduct, business principles or code of conduct or similar document. The words do not have to match, but the principles need to be there: a) General Ethics: conduct business with honesty/integrity (examples: avoid conflicts of interest, stealing, extortion, embezzlement, protect corporate assets, compete fairly), protection of identity and non-retaliation (example: whistleblower, anonymous reporting) b) Legal compliance: Anti-Corruption or Anti-Bribery, Anti-Trust, Privacy, Intellectual Property (IP) Protection, Responsibly Sourcing Minerals

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Two or more of minimum requirement elements are missing or ineffective 2. Does not contain commitment to continuous improvement and legal compliance 3. Percentage of workers not aware of code content is >20%	One or more of the following is true: 1. No endorsement of senior management, 2. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 3. Percentage of workers not aware of code content is ≤20%	Not Applicable
Remote Verification Acceptable:	YES		

E2) Management Accountability and Responsibility

The Participant clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

E2.1 Responsibilities and authorities are adequately and effectively defined and assigned for all employees/workers (senior managers to workers) for implementation of management systems, and for compliance with laws, regulations and codes pertaining to: A) Labor B) Health & Safety C) Environment and D) Ethics.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Senior representative <ol style="list-style-type: none"> a) A senior representative is assigned responsibility for implementing programs <ol style="list-style-type: none"> i) To ensure compliance with laws and regulations and the requirements of the RBA ii) Is authorized to implement programs, procedures and corrective actions as needed for regulatory compliance and RBA conformance 2) Assignment <ol style="list-style-type: none"> a) Responsibilities and authority of each organizational level are documented in position plans, job descriptions and/or the facility's management system documentation <ol style="list-style-type: none"> i) For normal situations ii) For emergency situations

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. if a valid third-party ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System)

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Two or more of minimum requirement elements are missing or ineffective 2. No identified management representative authorized to implement the management system of a component	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	Not Applicable
Remote Verification Acceptable:	YES		

E2.2 An adequate and effective management review and continuous improvement process for A) Labor, B) Health & Safety, C) Environment and D) Ethics performance and management systems are established

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Process a) Adequate and effective annual management system review process is in place 2) Records a) System review meetings b) Preventive corrective action plan following the review c) Management review meeting presentation materials/analysis/data

Additional assistance:

Site Observations	Record Review
	1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. If a valid ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System) 2) Management review minutes include e.g. a) Agenda b) Presentation material (references) c) Date d) Who was present (including senior manager) e) Progress towards objectives f) Results of Audits g) Completion of corrective/preventive actions h) Risks/issues i) Other information needed to determine the effectiveness of the management system and identify improvement opportunities j) Agreed preventive/corrective actions

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Two or more of minimum requirement elements are missing or ineffective 2. Senior management does not assess annually	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	Not Applicable
Remote Verification Acceptable:	YES		

E3) Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

E3.1 An adequate and effective compliance process to monitor, identify, understand and ensure compliance with applicable laws and regulations and customer requirements pertaining to: A) Labor B) Health & Safety C) Environment and D) Ethics is established

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Process <ul style="list-style-type: none"> a) Adequate and effective <u>quarterly</u> compliance process to maintain a current understanding of applicable legal and customer requirements: <ul style="list-style-type: none"> i) Identify ii) Track iii) Assess iv) Integrate v) Implement vi) Records 2) Records <ul style="list-style-type: none"> a) Accurate and up to date compliance register b) A compliance calendar or reminders/tasks/calendar appointments via an e-mail system. c) Summaries of applicable laws and regulations and the key customer requirements that impact the operations d) New/changed operations/policies/procedures as a result of the review process for new requirements

Additional assistance:

Site Observations	Record Review
	1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. if a valid ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System)

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. Two or more of minimum requirement elements are missing or ineffective	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	Not Applicable
Remote Verification Acceptable:	YES		

E4) Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Auditee's operations Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

E4.1 An adequate and effective risk management process to identify, assess, and minimize/mitigate/control its risks in the areas of: A) Labor C) Environment and D) Ethics is in place

Conformance Requirements:

Site Observations	Record Review
<p>1) Control measures are in place for identified risks</p>	<p>1) Process</p> <ul style="list-style-type: none"> a) Adequate and effective risk assessment process using the hierarchy of controls or equivalent process is in place to identify the most significant risks (including applicable legal requirements and applicable customer requirements). b) The risk assessment is updated when there is a Significant Change c) Any identified risk has an action plan to minimize such risk and procedural controls and/or improvement objective. d) Effectiveness of controls is evaluated on a regular basis <p>2) Records</p> <ul style="list-style-type: none"> a) Formal risk assessment reports b) Corrective/preventive action plan for identified risks c) Procedural controls are documented d) Where controls are not yet in place an implementation plan (with owners and due date) is in place and on track

Additional assistance:

Site Observations	Record Review
	<p>1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. if a valid ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System)</p> <p>2) Scope of the risk assessment:</p> <ul style="list-style-type: none"> a) Every site operation/process b) Physical location c) Consideration of multiple chemical exposures combined physical and chemical exposure effects, and extended work periods (as applicable) <p>3) For Ethics, - Risk assessment considers business circumstances (country of operations, stakeholders, ...) and covers at minimum honesty, integrity, intellectual property protection, bribery, corruption, fraud/embezzlement, embezzlement, extortion, legal, ethical, fair business/marketing practices, reporting violations, whistleblower protection, kickbacks, bribes, privacy, unlawful payments, ...</p> <p>4) <u>Health and Safety Risk assessment is covered in B1.2</u></p>

Rating:

Priority	Major	Minor	Not Applicable
<p>1. Imminent and significant impact are confirmed on facility, life, limb or community without action</p>	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. Two or more of minimum requirement elements are missing or ineffective 2. No risk process adequate for the scope and nature of the operations and no controls in place 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 2. Risk process adequate for the scope and nature of the operations AND risk assessment performed but no adequate controls in place 3. No consideration of multiple chemical exposures 	<p>Not Applicable</p>
<p>Remote Verification Acceptable:</p>	<p>YES</p>		

E5) Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Participant's social, environmental, and health and safety performance, including a periodic assessment of Participant's performance in achieving those objectives.

E5.1 An adequate and effective performance management process for A) Labor, B) Health & Safety, and D) Ethics, including setting performance (improvement) objectives and targets, developing and implementing improvement plans, regularly reviewing progress toward achieving targets, and making appropriate adjustments if needed is in place

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Process <ol style="list-style-type: none"> a) Adequate and effective <u>annual</u> performance management process within formal and communicated indicators, objectives and targets b) Additional action plans if indicator, objective or target is off track 2) Records <ol style="list-style-type: none"> a) Formal target, indicator and objective tracking b) Regular progress reporting c) System review meetings d) Preventive corrective action plan following the review e) Management review meeting presentation materials/analysis/data

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. If a valid ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System) 2) Process <ol style="list-style-type: none"> a) Scope of indicators, objectives and targets: <ol style="list-style-type: none"> i) Consideration of risk assessment results ii) Legal and regulatory requirements iii) Company standards/requirements. 3) The process should also include <ol style="list-style-type: none"> a) Assignment of owners b) Implementation plans c) Completion dates d) Communication of objectives to workers (as appropriate). e) How frequently progress in meeting objectives is reviewed f) Objectives and targets are clearly designed to achieve continual improvement 4) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. If a valid ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System) 5) Management review minutes include e.g. <ol style="list-style-type: none"> a) Agenda b) Presentation material (references)

	<ul style="list-style-type: none"> c) Date d) Who was present (including senior manager) e) Progress towards objectives f) Results of Audits g) Completion of corrective/preventive actions h) Risks/issues i) Other information needed to determine the effectiveness of the management system and identify improvement opportunities <ul style="list-style-type: none"> 6) Agreed preventive/corrective actions 7) <u>Auditor guidance: Reporting on this question will include the detail of the current targets and current progress against the targets</u> 8) <u>Environment objectives, targets and performance are addressed in C2.1</u>
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Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: <ol style="list-style-type: none"> 1. Two or more of minimum requirement elements are missing or ineffective 2. No targets established 3. No review takes place on progress 4. Senior management does not assess annually 	One or more of the following is true: <ol style="list-style-type: none"> 1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 2. Targets are established but no review takes place 3. No corrective actions taken if progress is off track 	Not Applicable
Remote Verification Acceptable:	YES		

E6) Training

Programs for training managers and workers to implement Participant's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

E6.1 An adequate and effective training process is established for all managers/workers on all policy/procedures/job related aspects and performance targets related to A) Labor, B) Health and Safety, C) Environment, and D) Ethics

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Process <ol style="list-style-type: none"> a) adequate and effective training to workers/managers: <ol style="list-style-type: none"> i) New employee orientation plan ii) Training needs analysis iii) Training plan iv) Training material v) Training records vi) Training frequency vii) Training efficiency verification b) Minimum training topics are covered 2) Evaluation <ol style="list-style-type: none"> a) The training programs will be evaluated on a regular basis not exceeding 3 years or sooner if there is a Significant Change 3) Records <ol style="list-style-type: none"> a) Training records include a verification of training effectiveness b) Training evaluation reports and corrective action if required c) Educational materials

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) <u>This includes conformance section training – this section must always be completed even if a valid systems certificate is available (e.g. ISO 14001 for environment)</u> 2) <u>Health & Safety training is listed in B8</u> 3) <u>For ethics: this includes workers but also all subcontractors, Suppliers, business partners and other relevant parties</u> 4) Minimum training topics <ol style="list-style-type: none"> a) Labor <ol style="list-style-type: none"> i) Freely Chosen Employment (avoidance of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor) ii) Worker Terms and Conditions iii) Non-retention of personal documentation iv) Freedom of movement v) Legal minimum working age vi) Young worker protection vii) Apprentice/Intern/Student Worker employment viii) Working hours including overtime

	<ul style="list-style-type: none"> ix) Mandated breaks, holidays and vacation days, including time off when ill or for maternity leave x) Wages statement and wage calculation xi) Disciplinary procedures xii) Non- discrimination and harassment xiii) Reasonable accommodation for religious practices xiv) Freedom of Association/Collective Bargaining and peaceful assembly b) Environment <ul style="list-style-type: none"> i) Reduction programs ii) Hazardous waste handling, storage and disposal iii) Solid waste handling, storage and disposal iv) Air emissions and air emission control systems v) Material restriction vi) Water use, discharge and internal water channel contamination protection vii) Storage and disposal viii) GHG/ Energy use, reduction and maintaining energy and fuel-consuming operations c) Ethics <ul style="list-style-type: none"> i) Upholding the highest standards of integrity in all business interactions ii) Obtaining undue or improper advantage being promised, offered, authorized, given or accepted iii) Intellectual Property Protection iv) Fair Business, Advertising and Competition v) Non-retaliation or protection of identity vi) Purchasing of the 3TG minerals does not finance or benefit armed groups or contribute to serious human rights abuses in Conflict-Affected and High-Risk Areas vii) Unauthorized disclosure of personal information d) Management Systems <ul style="list-style-type: none"> i) Responsibilities and authorities are adequately and effectively defined 5) Grievance and complaints systems
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Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Two or more of minimum requirement elements are missing or ineffective 2. Two or more focus areas are missing in the communications (policy, performance, practice, expectations)	One or more of the following is true: 1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 2. One focus area is missing in the communications (policy, performance, practice, expectations)	Not Applicable
Remote Verification Acceptable:	YES		

E7) Communication

Process for communicating clear and accurate information about Auditee's policies, practices, expectations and performance to workers, Suppliers and customers.

E7.1 An adequate and effective worker/manager, Supplier and customer communication/reporting process for A) Labor, C) Environment, and D) Ethics policies, practices and performance is established

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ul style="list-style-type: none"> 1) Process <ul style="list-style-type: none"> a) Adequate and effective worker/manager, Supplier and customer communication/reporting process to Suppliers is in place <ul style="list-style-type: none"> i) Suppliers <ul style="list-style-type: none"> (1) Correspondence to Supplier management (2) Contract terms and conditions requiring Suppliers to conform to the RBA code and comply with all applicable AC ii) Customers <ul style="list-style-type: none"> (1) Recruitment practices and performance (including freely chosen employment, e.g. Demographics of labor and list of labor agents/ contractors with percentage of workforce, costs to workers (in total absolute numbers and per contract base) and labor agent/contractor fees). iii) Workers / Managers <ul style="list-style-type: none"> (1) The minimum communication topics are covered 2) Evaluation <ul style="list-style-type: none"> a) The communication programs will be evaluated on a regular basis not exceeding 3 years or sooner if there is a Significant Change 3) Records <ul style="list-style-type: none"> a) Communications records include a verification of communication effectiveness b) Educational materials c) Presentations to Suppliers

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) <u>This includes conformance section communications – this section must always be completed even if a valid systems certificate is available (e.g. ISO 14001 for environment)</u> 2) <u>Health & Safety communications is listed in B8</u> 3) <u>Submitting SAQ to customers does not qualify as disclosure/communication to customers</u> 4) Minimum Communications topics <ol style="list-style-type: none"> a) Labor <ol style="list-style-type: none"> i) Freely Chosen Employment (avoidance of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor) ii) Worker Terms and Conditions iii) Non-retention of personal documentation iv) Freedom of movement v) Legal minimum working age vi) Young worker protection vii) Apprentice/Intern/Student Worker employment viii) Working hours including overtime ix) Mandated breaks, holidays and vacation days, including time off when ill or for maternity leave x) Wages statement and wage calculation xi) Disciplinary procedures xii) Non- discrimination and harassment xiii) Reasonable accommodation for religious practices xiv) Freedom of Association/Collective Bargaining and peaceful assembly b) Environment <ol style="list-style-type: none"> i) Reduction programs ii) Hazardous waste handling, storage and disposal iii) Solid waste handling, storage and disposal iv) Air emissions and air emission control systems v) Material restriction

	<ul style="list-style-type: none"> vi) Water use, discharge and internal water channel contamination protection vii) Storage and disposal viii) GHG/ Energy use and reduction c) Ethics <ul style="list-style-type: none"> i) Upholding the highest standards of integrity in all business interactions ii) Obtaining undue or improper advantage being promised, offered, authorized, given or accepted iii) Intellectual Property Protection iv) Fair Business, Advertising and Competition v) Non-retaliation or protection of identity vi) Purchasing of the 3TG minerals does not finance or benefit armed groups or contribute to serious human rights abuses in Conflict-Affected and High-Risk Areas vii) Unauthorized disclosure of personal information d) Management systems <ul style="list-style-type: none"> i) Grievance and complaints systems
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Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: <ol style="list-style-type: none"> 1. Two or more of minimum requirement elements are missing or ineffective 2. Two (2) or more focus areas are missing in the communications (policy, performance, practice, expectations) 	One or more of the following is true: <ol style="list-style-type: none"> 1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 2. One (1) focus area are missing in the communications (policy, performance, practice, expectations) 	Not Applicable
Remote Verification Acceptable:	YES		

E8) Worker Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation

E8.1 An adequate and effective grievance/complaint process where work-related and Code-related grievances or complaints without fear of reprisal or intimidation is established can be confidentially communicated

Conformance Requirements:

Site Observations	Record Review
1) Grievance and complaint channels are clearly communicated 2) Internal communication of the grievance mechanism must be in workers' native language(s) and visible	1) Process a) Adequate and effective process to anonymously report grievances and complaints without fear of reprisal, which is internal (for workers and staff) and external (for workers of suppliers, local community or interested actors AND Whistleblowers) b) Clear grievance channels so anyone is comfortable reporting grievances and so that reporting is encouraged 2) Investigation and actions a) Auditee shall promptly investigate the validity of the any grievance or complaint and take prompt remedial action if the claim is valid b) <u>All who file a grievance or complaint shall have their identity protected and Auditee will ensure a no reprisal or intimidation approach</u> 3) Records: a) Grievance/complaint records are in place for a period of at least 12 months b) Workers are provided with written information on how to report grievances and complaints

Additional assistance:

Site Observations	Record Review
	1) <u>This includes conformance section communications – this section must always be completed even if a valid systems certificate is available (e.g. ISO 14001 for environment)</u> 2) <u>If finding of retaliation is regarding an ethics violation or the identity of a grievant is not protected, the finding should be reported in D</u> 3) Auditor guidance: evidence to show actions have been taken for the grievance/complaints in the past 12 months” may need to spot check 1 or 2 case records.

Rating:

Priority	Major	Minor	Not Applicable
1. Confirmed case not investigated or without corrective action plan	1. Two or more of minimum requirement elements are missing or ineffective 2. No anonymous reporting channels 3. No action has been taken/recorded for the grievance/complaint for 3 months	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented	Not Applicable
Remote Verification Acceptable:	NO		

E8.2 An adequate and effective process to solicit and encourage worker participation, input and feedback for improvement

Conformance Requirements:

Site Observations	Record Review
<p>1) Feedback channels are clearly communicated and visible (suggestion box, ...)</p>	<p>1) Process</p> <ul style="list-style-type: none"> a) Adequate and effective process to obtain worker input and feedback such as: <ul style="list-style-type: none"> i) Worker surveys ii) Suggestions boxes iii) Worker focus groups iv) Joint worker-management committees v) Worker/union representatives vi) Process improvement teams. <p>2) Evaluation and actions</p> <ul style="list-style-type: none"> a) Auditee shall promptly evaluate the validity of the any input of feedback and take prompt action if the input/feedback is valid <p>3) Records:</p> <ul style="list-style-type: none"> a) Input/feedback records are in place for a period of at least 12 months b) Workers are provided with written information on how to provide input/feedback for improvement c) Action plans are available, implemented or on track.

Additional assistance:

Site Observations	Record Review
	<p>1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. if a valid third-party ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System)</p>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	1. No feedback mechanism(s) in place	1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited	1. No worker communication
Remote Verification Acceptable:	NO		

E9) Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

E9.1 An adequate and effective self-audit process to periodically assess conformance with the RBA Code pertaining to: A) Labor B) Health & Safety C) Environment and D) Ethics.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Process a) Adequate and effective self-audit process to periodically assess conformance with: i) Applicable regulatory requirements ii) RBA Code requirements iii) Own policies, standards and management system iv) Other requirements to which the facility subscribes b) Audit findings are reviewed by senior management. 2) Records a) Self-audit Reports b) Corrective Action Plans as a result of the Self Audit, additional actions if the Corrective Action Plan is off-track

Additional assistance:

Site Observations	Record Review
	1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. if a valid third-party ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System) 2) Audit scope: a) All areas of the facility, b) All processes, physical conditions and work practices c) Review of documents and records d) Interviews with individuals responsible for SER.

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. No Audits carried out 2. Two or more of minimum requirement elements are missing or ineffective 3. Scope does not include regulatory compliance	One or more of the following is true: 1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 2. Scope includes regulatory compliance but not customer requirements	Not Applicable
Remote Verification Acceptable:	YES		

E10) Corrective Action Process

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

E10.1 Has established an adequate and effective corrective action process to rectify and close Non-conformances for A) Labor B) Health & Safety C) Environment and D) Ethics.

Conformance Requirements:

Site Observations	Record Review
Not Applicable	1) Process <ul style="list-style-type: none"> a) adequate and effective corrective action process is in place which contains the following: <ul style="list-style-type: none"> i) Corrective action reports/plans and tracking tables ii) additional actions are taken when a corrective action is off track iii) A demonstrated link between the CAP and the performance management objectives and targets. iv) Closure of action items is confirmed by a management representative after verification by the appropriate person 2) Records <ul style="list-style-type: none"> a) Records documenting the non-conformance b) Corrective action plan for each non-conformance c) Progress reports on the Corrective Action plan d) Closure verification reports (with mgmt. confirmation) e) Copies of any regulatory citations/violation notices received in the past three years, including any communications with the agencies are available for review.

Additional assistance:

Site Observations	Record Review
	1. Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. if a valid third-party ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System) 2. Scope of corrective action plan: <ul style="list-style-type: none"> a. All identified non-conformances identified via internal or external Audits, assessments, inspections, investigations and reviews against with the RBA Code including legal and customer requirements 3. Corrective action reports/plans and tracking tables <ul style="list-style-type: none"> a. Root cause analysis of the finding to ensure the system gap is addressed b. Specific corrective actions c. Owners of the action d. Due dates are established to address all Audit issues. 4. appropriate person = auditor, inspector, officer of the party which determined the non-conformance or their designate 5. <u>If closure was not verified by an independent third party or the original government agency, Auditor must verify closure</u> 6. Auditor guidance: General public record search by Auditors is performed to learn if the regulatory authorities have imposed corrective action or penalties in last 3 years for each component.

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Two or more of minimum requirement elements are missing or ineffective 2. One or more unaddressed regulatory actions or penalties.	One or more of the following is true: 1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 2. Regulatory actions or penalties are addressed but off track and no corrective actions are taken to get them back on track	The following are true: 1. No Audit or evaluation performed 2. Auditee has NOT been subject to any labor regulatory actions in the past 3 years. 3 data points are required to show there was no case in the past 3 years.
Remote Verification Acceptable:	YES		

E11) Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

E11.1 Adequate and effective documentation and records process with appropriate levels of access to ensure privacy for A) Labor, B) Health & Safety, C) Environment, and D) Ethics

Conformance Requirements:

Site Observations	Record Review
1) Documents are securely stored with authorized access only	1) Process a) Adequate and effective documentation and records process with appropriate retention (on and off site) and appropriate levels of access to ensure privacy conforming to i) Regulatory (including record retention laws) 2) Records a) A listing/table of documents and records retained required is available for review b) Record retention conforms to the requirements c) Minimum records are available for review

Additional assistance:

Site Observations	Record Review
	1) Requirements apply for each component. Components are Labor, Health & Safety, Environmental and Ethics. If a component has a valid certification, then this is considered conformance for that component on this question (i.e. If a valid third-party ISO 14001 certificate is in place the Auditor will not verify the Environmental Management System) 2) Minimum records: a) Records of wages paid, and hours worked b) Verification of worker age c) Financial Audit reports d) Non-Disclosure Agreements (NDAs) e) Contract terms and conditions f) Self-Audit reports g) Regulatory compliance evaluations h) Risk assessments i) Work practices and procedures j) Performance in meeting objectives and targets k) Reports of inspections by regulatory agencies l) Incident investigations m) Worker complaints n) Training records o) Management System Review minutes and action items p) Corrective action records. q) Conflict of interest declarations are available in personnel files

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	One or more of the following is true: 1. Two or more of minimum requirement elements are missing or ineffective 2. Does not meet regulatory requirements	One or more of the following is true: 1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 2. Meets regulatory requirement but not customer requirements	Not Applicable
Remote Verification Acceptable:	NO		

E12) Supplier Responsibility

Process to communicate Code requirements to Suppliers and to monitor Supplier compliance to the Code.

E12.1 The RBA Code requirements have been communicated to the next tier major Suppliers

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Corporate level implementation <ol style="list-style-type: none"> a) Documented corporate policy b) Documented corporate goal c) Documented corporate process d) Assigned responsibility e) Proof of implementation 2) Facility level (in case no corporate level implementation) <ol style="list-style-type: none"> a) Process <ol style="list-style-type: none"> i) Suppliers <ol style="list-style-type: none"> (1) Supplier program (identification of Major Suppliers, definition of what is major) ii) Communication <ol style="list-style-type: none"> (1) Adequate and effective communication process with its Major Suppliers on the code and its requirements or inserted the requirements of the code and its provisions into the contract it has with Major Suppliers. iii) Contracts <ol style="list-style-type: none"> (a) Suppliers <ol style="list-style-type: none"> (i) Enforcement language on the implementation of the RBA Code (b) Labor Agents and Contractors <ol style="list-style-type: none"> (i) Enforcement language on the implementation of the RBA Code regarding Labor and Ethics CA (ii) Compliance with legal requirements in both home and sending country. (iii) Workers can resign without penalty (iv) Conform with all AC regarding workers in their operations b) Records <ol style="list-style-type: none"> i) Contract with Suppliers and Labor Agents and Contractors ii) Communication materials to Suppliers and Labor Agents and Contractors iii) Enforcement notification to Suppliers and Labor Agents and Contractors

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) * =sample size is square root of total workers on site of Suppliers and through a labor agent/contractor or 5 workers, whichever is larger 2) <u>Penalty includes no threat of punishment, fines, violence, or withholding wages</u> 3) Supplier is determined by the criteria defined by the Auditee (annual spending, critical component to core business, more than once purchase, within ICT industry supply chain, ...). For the scope of this code provision the "next tier major supplier" definition will always include any labor agents/contracts and on-site service providers that fall outside the scope of sections A3 and A4. 4) <u>Additional specific forced labor requirements for Labor Agents and Contractors are listed in A1. Forced labor findings Labor Agents and Contractors are rated in A1</u> 5) <u>Hazardous waste vendors' findings /corrective action plans which are missing / off track are rated in C3.</u> 6) <u>Auditor guidance: Determining which suppliers are a Supplier (= "next tier Major Supplier") is a process which must be verified during the audit</u>

Rating:

Priority	Major	Minor	Not Applicable
Not Applicable	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. There is no RBA Supplier implementation procedure and there are no documented communication vehicles with Suppliers. 2. Percentage of workers working thru Labor Agents and Contractors that cannot state how their employment terms and conditions meet the relevant labor requirements of the RBA code is >20%* 3. The responsibility could be shared corporate and facility then complete the relevant section 1 and/or 2 <ol style="list-style-type: none"> a. If implementation is done at corporate level then verify 1), if not complete then "Major" b. if implementation at facility level then verify 2) c. If implementation at both levels then verify 1) and 2) then the highest of both rating apply 	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. RBA Supplier implementation procedures exist but the percentage of Suppliers that have not been communicated to is $\geq 20\%$ 2. Percentage of workers working thru Labor Agents and Contractors that cannot state how their employment terms and conditions meet the relevant labor requirements of the RBA code is >5% and $\leq 20\%$* 	No Suppliers
Remote Verification Acceptable:	YES (NO, if non-conformance for Labor Agents and Contractors)		

E12.2 Adequate and effective process to ensure that the Suppliers implement the RBA Code

Conformance Requirements:

Site Observations	Record Review
Not Applicable	<ol style="list-style-type: none"> 1) Corporate level implementation <ol style="list-style-type: none"> a) Documented corporate policy b) Documented Corporate Goal c) Documented corporate process d) Assigned responsibility e) Proof of implementation 2) Facility level (in case no corporate level implementation) <ol style="list-style-type: none"> a) Process <ol style="list-style-type: none"> i) RBA code implementation process for Suppliers is available and includes <ol style="list-style-type: none"> (1) A risk assessment. <ol style="list-style-type: none"> (a) If a self-reported risk assessment is used such as an SAQ then information needs to be validated and/or an Audit performed to verify risk information. (b) An audit (VAP or CMA) or an AMA (if done by a third-party Qualified Audit Firm is accepted). (2) An obligation to go through the CAP process with the Supplier If non-conformances are detected (3) A commitment to not immediately de-source at a priority non-conformance discovery state but only at the non-implementation of the CAP process b) Records <ol style="list-style-type: none"> i) Verification visit reports for self-reported risk assessment ii) An Audit (CMA or VAP), an AMA (if done by third-party qualified Audit Firm is acceptable) iii) A corrective action plan for non-conformance areas identified iv) A verification mechanism that corrective actions are implemented v) Review of records related to A3 for on-site service provider workers as appropriate vi) Review of records related to A4 for on-site service provider workers as appropriate

Additional assistance:

Site Observations	Record Review
	<ol style="list-style-type: none"> 1) Supplier is determined by the criteria defined by the Auditee (annual spending, critical component to core business, more than once purchase, within ICT industry supply chain, ...). For the scope of this code provision the "next tier major supplier" definition will always include any labor agents/contracts and on-site service providers (such as security guards, janitorial services, ...) that fall outside the scope of sections A3 and A4. 2) If an alternative risk-based approach exists (in lieu of a fixed number of assessment/audits) there is documented criteria, guidelines, execution of assessments/audits and finding closure tracking 3) <u>Remote / desk-audit or focused audit processes and guidelines used on smaller, specialized facilities or service providers where a full RBA audit is not appropriate</u> 4) <u>Additional specific forced labor requirements for labor agents/contractors are listed in A1.</u> 5) <u>Hazardous waste vendors' findings /corrective action plans which are missing / off track are rated in C3.</u> 6) <u>Forced labor findings for labor agents or contractors are rated in A1</u>

Rating:

Priority	Major	Minor	Not Applicable
1. For indirect full time assigned workers of on-site service providers a priority non-conformance is confirmed on provision A3 or A4	<p>One or more of the following is true:</p> <ol style="list-style-type: none"> 1. Two or more of minimum requirement elements are missing or ineffective 2. No CAP in place for the majority of Suppliers (where applicable) 3. The responsibility could be shared corporate and facility then complete the relevant section 1 and/or 2 <ol style="list-style-type: none"> a. If implementation is done at corporate level then verify 1), if not complete then "Major" b. if implementation at facility level then verify 2) c. If implementation at both levels then verify 1) and 2) then the highest of both rating apply 	<ol style="list-style-type: none"> 1. One of minimum requirement elements is missing or ineffective, or a system element is not adequately documented or is prohibited 	<ol style="list-style-type: none"> 1. No Suppliers to facility
Remote Verification Acceptable:	YES (NO, if non-conformance for labor agents/contractors)		