



# RBA VAP Operations Manual

## Revision 7.1.2 – May 2023

Organizations working with and in the Responsible Business Alliance (RBA) 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 Remote Validated Assessment Program (VAP), please contact:  
RBA [vap@responsiblebusiness.org](mailto:vap@responsiblebusiness.org)

**Responsible Business Alliance**  
1725 Duke Street, Suite 300, Alexandria VA 22314, USA



## Table of Contents

Table of Contents .....	2
Appendix 10 Code Interpretation Guidance.....	4
1. General Notes.....	4
2. Internal Migrant Workers.....	5
3. General auditor guidance:.....	6
A. LABOR .....	8
A1) Freely Chosen Employment .....	8
A2) Young Workers .....	14
A3) Working Hours.....	18
A4) Wages and Benefits.....	23
A5) Humane Treatment.....	27
A6) Non-Discrimination/Non-Harassment.....	29
A7) Freedom of Association.....	32
A.M Labor Management Systems .....	36
A.M.1 Risk Assessment.....	36
A.M.2 Control processes.....	38
A.M.3 Communications .....	45
A.M.4 Performance Review and Continuous Improvement.....	48
B. HEALTH & SAFETY .....	52
B1) Occupational Safety .....	52
B2) Emergency Preparedness.....	57
B3) Occupational Injury and Illness .....	64
B4) Industrial Hygiene .....	66
B5) Physically Demanding Work .....	68
B6) Machine Safeguarding.....	69
B7) Food, Sanitation and Housing .....	70
B.M Health & Safety Management Systems .....	73
B.M.1 Risk Assessment.....	73
B.M.2 Control processes.....	76
B.M.3 Communications .....	82
B.M.4 Performance Review and Continuous Improvement.....	85



<b>C. ENVIRONMENT</b> .....	<b>89</b>
<b>C1) Environmental Permits and Reporting</b> .....	<b>89</b>
<b>C2) Hazardous Substances</b> .....	<b>90</b>
<b>C3) Solid Waste</b> .....	<b>91</b>
<b>C4) Air Emissions</b> .....	<b>92</b>
<b>C5) Water Management</b> .....	<b>94</b>
<b>C6) Energy Consumption and Greenhouse Gas Emissions</b> .....	<b>96</b>
<b>C.M Environment Management Systems</b> .....	<b>97</b>
<b>C.M.1 Risk Assessment (and Risk Management)</b> .....	<b>97</b>
<b>C.M.2 Environment Control processes</b> .....	<b>99</b>
<b>C.M.3 Communications</b> .....	<b>102</b>
<b>C.M.4 Performance Review and Continuous Improvement</b> .....	<b>105</b>
<b>D. ETHICS</b> .....	<b>110</b>
<b>D1) No Improper Advantage</b> .....	<b>110</b>
<b>D2) Disclosure of Information</b> .....	<b>111</b>
<b>D3) Intellectual Property</b> .....	<b>112</b>
<b>D4) Fair Business, Advertising and Competition</b> .....	<b>113</b>
<b>D5) Protection of Identity and Non-Retaliation</b> .....	<b>114</b>
<b>D6) Privacy</b> .....	<b>115</b>
<b>D.M Ethics Management Systems</b> .....	<b>116</b>
<b>D.M.1 Risk Assessment (and Risk Management)</b> .....	<b>116</b>
<b>D.M.2 Ethics Control processes</b> .....	<b>118</b>
<b>D.M.3 Communications</b> .....	<b>121</b>
<b>D.M.4 Performance Review and Continuous Improvement</b> .....	<b>123</b>
<b>E. SUPPLY CHAIN MANAGEMENT</b> .....	<b>127</b>
<b>E1) Company Commitment</b> .....	<b>127</b>
<b>E2) Materials Restrictions</b> .....	<b>128</b>
<b>E3 Responsible Sourcing of Minerals</b> .....	<b>129</b>
<b>E4) Supplier Responsibility</b> .....	<b>131</b>

# Appendix 10 Code Interpretation Guidance

## 1. General Notes

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

Unless otherwise stated, the records must be available on-site for auditors to review at the start of the audit and must cover at least the review period of the audit. If additional records are requested, then they must be available within 24 hours of the request or before noon time on the last day of the audit, whichever occurs first. If records that were requested are not available as stated, the records will be excluded by the auditor and will result in a finding.

The appendix also provides 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 (CBA), 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 Validated Audit (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” shall mean “Next Tier Major Supplier”. This is different to ‘supplier’ which can be any supplier to the facility.

## 2. Internal Migrant Workers

- Internal migrant worker: An individual that is recruited and migrates from their habitual place of residence to another state or province within the same country where they are a national for specific purposes of employment. This group of people may differ in race or color, religious, or cultural origin from the dominant group — often the majority population — of the country in which they live
- Internal migrant workers must be considered as a separate group, like foreign migrant workers, during the Validated Audit, in order to determine risks and conformance specific to this group.

A demographic group should never be put at risk by identification in the Validated Audit report, if such a risk does exist then the auditor is advised to identify the possible risk without pursuing to further investigate which could put the demographic group at risk. In such a case the rating “Risk of Non-Conformance” will be used.

### 3. General auditor guidance:

- Audit preparation
  - Ask open questions regarding worker demographics in the audit preparation conversation with the auditee to adapt the audit agenda and audit team for possible presence of internal migrant workers if necessary
  - Research the possible presence of IDP (internally displaced people = people displaced through violence or conflict within the country) and EDP (external displaced people = people displaced through violence or conflict of neighboring countries)
  - Ensure knowledge of applicable laws regarding the protection of internal migrant workers
  - Interview (in person or via phone) the third-party service providers, representatives of vocational schools and labor agents and contractors
  
- Reporting
  - The complete details of the recruitment process for internal workers should be documented in the Workforce Composition Survey (WCS) Template. The completed WCS should be uploaded to RBA Online as a separate attachment.
  
- Finding Severity Definition
  - Priority non-Conformance: A Priority non-conformance is any finding leading to:
    - Imminent Risk to life, limb, facility, the environment or the community
    - Egregious ethical breach
  
  - Major non-conformance:
    - Violation of applicable law
    - Systemic failure (e.g., same incident multiple times or multiple incidents at the same time)
    - Non conformance situation in which equal or greater than 20 % of total sample population is affected

- **Minor non-conformance:**
  - One-off incident, not likely to repeat
  - A non-conformance situation in which less than 20% of the total sample population is affected
  
- **Risk of Non-conformance:**
  - if the condition or practice meets minimal conformance with the requirement but would likely deteriorate to a non-conformance without some additional action or effort on the part of facility management.
  
- **Opportunity for Improvement:**
  - A situation which is not fully in conformance or can be improved but where a Corrective Action Plan is not mandatory but recommended. It is sometimes referred to as an “observation

## A. LABOR

### A1) Freely Chosen Employment

*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	Management Interview	Worker Interview
1) Workers move freely when needed to access basic liberties (no systems for unreasonable restriction in place such as toilet passes). 2) Workers are free to leave the Auditee location or dormitory (or living quarters) when not engaged in work.	1) <u>Voluntary work</u> a) Personnel files, grievance records and working hour record/wages do not show any form of non-voluntary labor and <u>all overtime is voluntary</u> b) Termination notice period is not stricter than 1 month c) Penalty to leave without reasonable notice is <60% of 1 month of gross base wages d) Terminating employment is voluntary with no explicit threat of punishment, fines, violence, or withholding wages e) All work is voluntary (including choice of learning placement assignment) 2) <u>Restriction of movement</u> a) Entry and leave records show no restriction in movement 3) <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 commencement of employment. 4) <u>Loans</u> a) Personal loans have a i) repayment maximum of 10 percent of the worker's gross base wage of the period of the loan ii) No interest permitted iii) No more than 6 months of installment (maximum loan duration) b) Education loan have a i) repayment maximum of 10 percent of the worker's gross base wage of the period of the loan ii) No more than 1 year of installment (maximum loan duration)	Applicable	Applicable



**Additional assistance:**

Site Observations	Record Review	Management Interview	Worker Interview
<p>If workers reside on site (dormitory), access to the dormitory is open or there are no unreasonable restrictions through process or undue security guard restrictions, on worker's ability to leave the facility including during workers' rest time.</p>	<ol style="list-style-type: none"> <li>1) <u>Definition</u> <ol style="list-style-type: none"> <li>a) Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving or providing accommodations to persons by means of threat, force, coercion, abduction or fraud for labor or services.</li> </ol> </li> <li>2) <u>Voluntary work</u> <ol style="list-style-type: none"> <li>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</li> <li>b) Non-voluntary overtime such as no right for a worker to refuse overtime</li> </ol> </li> <li>3) <u>Freedom of Movement</u> <ol style="list-style-type: none"> <li>a) Factory/dormitory exit and entry records</li> <li>b) Reasonable restriction can exist linked to Health &amp; Safety, Lack of training to access a certain area, IP restrictions, ...</li> <li>c) Freedom to enter and leave site does not apply to prison labor</li> <li>d) Examples for Freedoms: toilets, drinking water, external medical facilities, ...</li> </ol> </li> <li>4) <u>Fees</u> <ol style="list-style-type: none"> <li>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 "RBA Trafficked and Forced Labor - "Definition of Fees" available at <a href="https://www.responsiblebusiness.org/media/docs/RBADefinitionofFeesJan2021.pdf">https://www.responsiblebusiness.org/media/docs/RBADefinitionofFeesJan2021.pdf</a></li> </ol> </li> <li>5) If a fee is not specifically listed in RBA Trafficked and Forced Labor - "Definition of Fees" or does not fit any of the example categories, foreign and internal migrant workers shall not be required to pay anything that a 'Local worker would not be required to pay.</li> </ol> <p>Unintentional errors found in the Workforce Composition Survey are covered here. If intentional errors are found, then this is covered in section D2.1</p>		

**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

**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			

Guidance: "of all fees charged during recruitment and employment" means that fees should be added, and not consider each one individually for the purposes of the table rating

**Scenario 3 - For findings other than prohibited recruitment and hiring fees paid:**

Priority	Major	Minor	Not Applicable
1. Penalty to leave is >3 months of gross base wages 2. Workers restricted from voluntary employment termination. 3. Any situation that is putting workers at a health or safety risk (e.g., locking in factory or dorm). 4. Workers are restricted from movement through threat of firing, reporting to authorities or similarly severe threat. 5. Non-voluntary labor is present (other than scenarios above or Major nonconformance) 6. A Priority finding in A1.2 or A1.3	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

*A1.2 Terms and conditions of employment are provided in writing and in their native language prior to employment (foreign and internal migrant workers: before leaving their home country/region) and the key terms and conditions of employment are explained verbally in their native language, so workers understand what the terms and conditions of employment state.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not applicable	<ol style="list-style-type: none"> <li>1) <u>Employment terms and conditions</u> <ol style="list-style-type: none"> <li>a) Workers are informed prior to employment of the key employment terms and conditions in writing in their native language.</li> <li>b) Terms and conditions of employment state that workers can resign without penalty <u>if reasonable notice is given</u></li> <li>c) No form of “runaway” or “leave early” prevention language in the terms of employment</li> </ol> </li> <li>2) <u>Migrant workers:</u> <ol style="list-style-type: none"> <li>a) No substitution or change(s) allowed in the employment agreement upon arrival in the receiving country/region unless these changes are made to meet local law and provide equal or better terms</li> <li>b) Terms and conditions of employment shall be delivered to the migrant Workers before departure,                             <ol style="list-style-type: none"> <li>i) Indicating the conditions of work and remuneration (minimum wage which is guaranteed).</li> <li>ii) Information concerning the general conditions of life and work</li> </ol> </li> </ol> </li> <li>3) <u>Verbal explanation to workers</u> of the key components of the employment conditions in a language they can understand:                             <ol style="list-style-type: none"> <li>a) Nature of work</li> <li>b) Working hours, Days off and holidays</li> <li>c) Leave entitlements</li> <li>d) Benefits (housing, transportation, uniforms, etc.)</li> <li>e) What fees the worker will be charged and the amount(s)</li> <li>f) Wages and wage deductions (including all components of social insurance) and how these are calculated.</li> <li>g) Other non-legally required benefits provided (pension, insurances, etc.)</li> </ol> </li> </ol>	Applicable	Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
Not applicable	1) Reasonable notice = notice period which is stated within the employment terms and conditions, local law or mutual agreement with the employer, whichever is shorter 2) <u>Local workers</u> a) Employment terms and conditions = employment letter/agreement /contract b) Penalty = no threat of punishment, fines, violence, or withholding wages c) Any employment terms and conditions changes are declared and follow good practice communication/negotiation with worker d) Defined worker groups (e.g., student, intern, dispatch, etc.) in compliance with legal and/or customer requirements 3) <u>Foreign and Internal Migrant workers:</u> a) Employment for migrant workers = prior to leaving their home country or region b) Employment terms and conditions = employment letter/agreement /contract c) Penalty = threat of repatriation, threat of punishment, fines, violence, or withholding wages d) Any employment terms and conditions changes are declared and follow good practice communication/negotiation with worker 4) if the worker's native language is not available in written form, then the use of the worker's national language is allowed but the written document is explained in the workers' native language. 5) Verbal confirmation record of key components of the employment conditions		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1. Terms and conditions of employment substitution for materially worse conditions 2. No Terms and conditions of employment communicated prior to employment	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	NO		

*A1.3 The worker's government issued identification and personal documentation originals are not held by employer and agents*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Workers can demonstrate where personal records are kept securely. 2) Workers maintain possession or control over their identification records	1) Worker files contain no originals of workers' personal documentation 2) In some countries, the local law requires employers to hold foreign and internal migrant workers' personal documents. In those cases: a) Worker must have access to those records at all times. b) In no case shall there be a fee for the safe keeping of government-issued identification, passports or work permits. 3) Personal documents must not be tampered with or damaged in any way.	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Originals of workers' personal documentation: e.g., passport; work visa/permit; citizenship, residence, identification, social insurance cards/records; birth certificate; bank records; etc.) 2) It is acceptable for employers to hold personal documents only for the time needed to obtain or renew work permits and other legal documents. The employer or the agents provide proper documentation (stating the reason for holding of passport/ travel document and expected duration to hold such documents.)		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1. Any original personal records are kept, destroyed, concealed or confiscated. 2. If the law requires the document to be held, any evidence of tampering, restricting access for more than 12 hours or charging a fee 3. A priority rating on this finding also requires a priority finding on A1.1	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

## A2) Young Workers

### A2.1 Workers are not below the minimum age

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
No Identification of workers on-site under minimum age	Personnel files show all workers are above minimum age or above company policy minimum age	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	The worker roster shows all workers are above minimum age or above company policy minimum age (whichever is greatest)		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Confirmed underage workers are present at the facility or were present	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

*A2.2 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	Management Interview	Worker Interview
1. No workers under 18 are performing jobs that are hazardous	1) Health checks if required by law 2) Identification and assignment of young workers to non-hazardous positions 3) Restriction on time of day worked (Young workers are not allowed night work or overtime) 4) The implementation mechanisms are reflected in personnel files, medical files and work time records.	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Young workers are doing hazardous work	See finding severity definition	See finding severity definition	No workers under age 18 on site.
Remote Verification Acceptable:	NO		

*A2.3 Apprentice/Intern/Student Worker employment conforms with learning objectives.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
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.	1) internships/student workers assignments and apprenticeships that complement their course of study field or learning of a new vocation. 2) Maximum duration of apprenticeship (not more than 6 months if worker is paid below minimum wage); No agency or intermediary may be used in connection with the recruitment, hiring, arrangement, and management of student workers, interns or apprentices; Prohibition of use of student workers, interns or apprentices to simply fill a labor shortage (any obligations to employees under labor or social security laws and regulation arising from the regular employment relationship shall not be avoided through the excessive use of students, interns and apprentices); 3) Tri-partite agreement: If applicable, recorded specific requirements on tri-party agreement (student workers (and/or legal guardian), school and Auditee) (Student worker only) 4) 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 (Student worker only) Maintenance of student worker/intern or apprentices' records in personnel files (includes agreement if applicable, learning objectives, evaluations, reference to training material, assignment, ...). 5) Details on promotion/hiring opportunities after successful apprenticeship, eligibility, recruitment, employment agreement, nature of work, working hours, wages and benefits	Applicable	Applicable



Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	<ol style="list-style-type: none"> <li>1) If the student worker/intern or apprentice is a young worker, then all young worker requirements in A2.2 apply</li> <li>2) An apprenticeship is different from worker probation period. Apprentice/ intern/student worker programs are regulated by law in most countries, with specific limits on:</li> <li>3) 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.</li> <li>4) 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.</li> <li>5) Student workers/interns/apprentices should only be assigned to work activities that complement the academic degree/certificate or skill enhancement learning goals.</li> <li>6) Tri-partite agreement: <ol style="list-style-type: none"> <li>a) Student worker's full name</li> <li>b) Student worker's emergency contact information</li> <li>c) The name and address of the student worker's school</li> <li>d) The name and address of the Auditee, etc.</li> <li>e) Living conditions (if applicable)</li> <li>f) Wages and benefits</li> <li>g) Costs (if any) for meals and accommodation (must be no higher than a fair market rate)</li> <li>h) Working hours</li> <li>i) Nature of work and place where it will be performed</li> <li>j) Signed in three copies</li> </ol> </li> </ol>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	No student workers, interns, or apprentices on site
Remote Verification Acceptable:	NO		

### A3) Working Hours

*A3.1 Hours worked in a workweek does not exceed 60 hours.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) 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 a) Young workers' hours are restricted 2) Time records are accurate	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Three (3) months will be evaluated; these months should typically be a peak, a low, and an average month. For each month, the following is reported: a) Three (3) month sample b) Within sample, by work area c) Within sample, by job code d) Within sample, by nationality/region of origin (if foreign and internal migrant workers present) 2) Any workers under the age of 18 must be studied separately. (Separate working hours template should be used) 3) Waivers: a) If a government waiver/permit or alternative working hour system is in place, then it needs to comply with the RBA Waiver Policy. 4) 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. Use the official working hour evaluation template 5) If there were multiple work hour recording systems in place, 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 for the last month if period is less than three months. 6) Unless specified otherwise by local legal requirements, this provision does not apply to exempt workers, including those in executive, managerial, or professional positions. 7) If 60 hours limit are exceeded, ensure this was not because of an Emergency or Unusual Situation. Exceptional circumstances must be recorded at the time of the Emergency or Unusual Situation.  <u>Unintentional errors found in records are covered here. If intentional errors are found, then this is covered in section D2.1</u>		

Additional specific rating:					
Work Hours/Week	% Of Sample Work Weeks (Total or Specific Area or Function or Nationality/region of origin)				
	≤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 (stricter than 60 hours/week) to ≤60 hours/week	Conformance	Opportunity for Improvement	Minor*	Minor*	Major
< Local law (stricter than 60 hours/week) AND ≤60 hours/week	Conformance				
1. Young workers are found to be working in excess of the stricter of law or 60 hours per week 2. Young workers are working overtime 3. Young workers are doing night work	Priority				
Remote Verification Acceptable	NO				

Any legal non-conformance is rated a major non-conformance. An exception to this rule is if weekly working hours are below or equal to 60h/week but above local law for less than 40% of the reviewed working hours

*A3.2 Workers receive at least one (1) day off every seven (7) days*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) 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. <ul style="list-style-type: none"> <li>a) Young workers' days worked are restricted</li> </ul> 2) Time records are accurate	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Three (3) months will be evaluated; these months should typically be a peak, a low, and an average month. For each month, the following is reported: <ul style="list-style-type: none"> <li>a) Three (3) month sample</li> <li>b) Within sample, by work area</li> <li>c) Within sample, by job code</li> <li>d) Within sample, by nationality/region of origin (if foreign and internal migrant workers present)</li> </ul> 2) Any workers under the age of 18 must be studied separately. (Separate working hours template should be used)                     3) Working hours evaluation sample should be reflect the demographics of location, and not focused on highest hours only                     4) Use the official working hour evaluation template                     5) If there were multiple days off recording systems in place, 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 for the last month if review period is less than three months.                     6) Unless specified otherwise by local legal requirements, this provision does not apply to exempt workers, including those in executive, managerial, or professional positions.                     7) If 6 consecutive days are exceeded, ensure this was not because of an Emergency or Unusual Situation. Exceptional circumstances must be recorded at the time of the Emergency or Unusual Situation.		
<p><u>Unintentional errors found in records are covered here. If intentional errors are found, then this is covered in section D2.1</u></p>			

Additional specific rating:				
Consecutive Days	% Of Sampled Workers (Total or Specific Area, Function or Nationality/region of origin)			
	≤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(or local law if stricter) to ≤12 Consecutive Days	Conformance	Minor	Minor	Major
≤6(or local law if stricter) Consecutive Days	Conformance			
Workers under the age of 18 are found to be working consecutive days in excess of the stricter of law or 6 consecutive days	Priority			
Remote Verification Acceptable	NO			

*A3.3 Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Workers take mandatory breaks which include at least one meal break per shift	Leave records are securely kept, accurate and consistent with medical certificates, actual leaves (including maternity/paternity) and holidays	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Workers receive a reasonable amount of time off for sickness or maternity leave without job loss or financial penalty when supported with a medical certificate. 2) 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.  <u>Unintentional errors found in records are covered here. If intentional errors are found, then this is covered in section D2.1</u>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Workers are not allowed time off for illness or maternity with valid medical certificate	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

## A4) Wages and Benefits

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

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>1) "Pay equals time worked" applies; this means any company-required activity</li> <li>2) All workers shall be paid no less than the agreed* wage for all regular hours.</li> <li>3) Overtime and other compensation and benefits are paid and are on top of agreed* wage for regular hours</li> <li>4) Payment made to leavers (resigned workers) in compliance not later than one month after final day on the job.</li> <li>5) Wages benefits, and overtime are correctly calculated, and accurate pay records are maintained.</li> <li>6) Wages are paid directly to workers (or a legally designated third party) with no unauthorized deductions (including for disciplinary measures) in a timely manner.</li> <li>7) For recurring pay (including overtime, other) should not be delayed more than two days after the agreed timing for payment</li> <li>8) Wage rate for learners               <ol style="list-style-type: none"> <li>a) Intern: at least the minimum wage, unless their performance is significantly below expectation for that wage cycle,</li> <li>b) Apprentice: at least the minimum wage unless the Law specifically defines a lower wage for this type of worker. Agreed apprentice wage increase when meeting new skills requirements. Workers after a successful apprenticeship have clearly recorded promotion and wage adjustment</li> </ol> </li> <li>9) No financial/scholastic penalty (note scholastic penalty is allowed only if directly related to underperformance on educational component of program) (student worker and intern)</li> <li>10) maternity or sick leave absences do not incur a financial penalty</li> <li>11) Wage records are accurate</li> <li>12) No deductions or payment for PPE</li> <li>13) In case the worker (employed under third party service provider, labor agent, vocational school or contractor) is transferred to different region/country/province/state employment site, the minimum wage and other benefits entitlement shall be paid according to the legal provision where workers are deployed in.</li> <li>14) Workers are paid directly without any intermediary (except bank)</li> </ol>	Applicable	Applicable
Additional assistance:			
Site Observations	<ol style="list-style-type: none"> <li>1) Auditee shall not deduct educational fees from the student worker's wages, nor shall they deduct placement fees from the student worker's wages.</li> <li>2) 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</li> </ol>	Management Interview	Worker Interview

Additional specific rating:			
Priority	Major	Minor	Not Applicable
Payments have been delayed for more than 1 month beyond regular payment cycle	See finding severity definition 1) Payments are delayed less than one month beyond normal payment cycle and for >5 percent of worker samples 2) The 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 $\geq 5\%$	See finding severity definition  Payments have been delayed less than one month beyond normal payment cycle and for $\leq 5$ percent of worker sample	Not Applicable
Remote Verification Acceptable:	NO		

\* Agreed = the stricter of legal minimum wage, wage stipulated in employment contract or wage set in Collective Bargaining Agreement



*A4.2 For each pay period, workers are provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Workers are provided with payroll receipts that clearly indicate compensation (before payment), including: <ul style="list-style-type: none"> <li>a) Regular hours</li> <li>b) overtime hours</li> <li>c) overtime compensation levels</li> <li>d) No disciplinary deductions</li> <li>e) detail of deductions                             <ul style="list-style-type: none"> <li>i) Insurance contributions</li> <li>ii) Employer</li> <li>iii) Worker contributions</li> </ul> </li> </ul> 2) Pay slip records are accurate	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Review evidence that workers are given information relating to wages in an understandable form. 2) Verify for statistical sample and for a minimum of three months: <ul style="list-style-type: none"> <li>a) Worker signatures on pay registers</li> </ul> 3) In most countries, the law states the requirement of the employer to contribute a portion of worker's wages to national/regional 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. 4) <u>RBA DOES NOT accept a signed agreement with a worker that allows for anything except compliance to local law regarding social insurance</u>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	Yes		

*A4.3 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	Management Interview	Worker Interview
Not Applicable	1) <u>Calculations:</u> Records of employer contributions to worker insurance schemes, e.g., unemployment, retirement/pension, health/medical, life, accident, disability, etc. are available on a monthly basis that: <ul style="list-style-type: none"> <li>a) Allows for analysis by individual worker</li> <li>b) Total per contribution type.</li> </ul> 2) <u>Payment:</u> Payment records for these contributions are available and payments are made timely.	Applicable	NOT Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Sample excludes new workers less than 2 pay cycles with the employer 2) 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/regional or private insurance schemes. These generally consist of retirement, unemployment, accident, medical and possibly others. 3) <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>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Payment of government or regulatory deductions have not been made or paid on time for at least 3 months	See finding severity definition	See finding severity definition	No withholdings or required contributions
Remote Verification Acceptable:	YES		

## A5) Humane Treatment

### A5.1 No evidence of inhumane treatment exists

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
No identification of possible instances of inhumane treatment	1) Grievance records do not show instances of inhumane treatment 2) Disciplinary records do not show inhumane disciplinary measures	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	Inhumane treatment includes any form of harassment, violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse, as well as withdrawal of basic physical comforts provided to other workers or isolation of families.	If any instances are reported verify the records, logs, documentation and disciplinary process.	If any instances are reported verify the records, logs, documentation and disciplinary process.
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Inhumane treatment case without action taken	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

*A5.2 Disciplinary actions are recorded and reviewed by management*

Conformance Requirements:				
Site Observations	Record Review		Management Interview	Worker Interview
Not Applicable	1) Records of all cases of disciplinary action are available 2) All records of disciplinary action against workers must be reviewed by management and verifiably communicated to them 3) Disciplinary records show disciplinary actions with signature or confirmation of worker		Applicable	Applicable
<b>Additional specific rating:</b>				
Priority	Major	Minor	Not Applicable	
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable	
Remote Verification Acceptable:	YES			

## A6) Non-Discrimination/Non-Harassment

### A6.1 No evidence of discrimination

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) No visible instances of discrimination	1) Human resources: <ul style="list-style-type: none"> <li>a) No evidence of discrimination in the following records               <ul style="list-style-type: none"> <li>i) Pay roll</li> <li>ii) Benefits</li> <li>iii) General training (access to training)</li> <li>iv) Disciplinary</li> <li>v) Application questions and testing</li> <li>vi) Hiring</li> <li>vii) Termination</li> <li>viii) Promotion</li> <li>ix) Job postings and advertisements</li> <li>x) Job descriptions</li> <li>xi) Worker representation or union affiliation</li> </ul> </li> <li>b) Workers are provided accommodations solely based on non-discriminatory criteria</li> </ul> 2) Medical tests: <ul style="list-style-type: none"> <li>a) Workers or potential workers are not subjected to medical tests that could be used in a discriminatory way.</li> <li>b) Health tests, pregnancy or virginity testing, or contraception are not used as a condition of employment.</li> </ul> 3) Pregnancy/Maternity/Paternity: <ul style="list-style-type: none"> <li>a) All conditions regarding virginity, pregnancy and postnatal employment protections, benefits, and pay are met</li> </ul>	Applicable	Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) <b>Discrimination:</b> any decision or criteria which is other than the candidate's ability to perform the job's requirements or the candidate's fitness for the job 2) <b>Medical tests:</b> a) In some cases, local governments require health tests for foreign and internal migrant workers prior to issuance of work visas. b) No discrimination or harassment based on 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 or harassment 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. 3) <b>Pregnancy/Maternity/Paternity:</b> a) Review for discrimination or harassment based on virginity, pregnancy tests, maternity and paternity leaves: 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. 4) <u>Discrimination cases are applicable if these cases have a recorded basis, allegations are not considered as a discrimination case.</u>		Auditor guidance: sample of interviewed Workers MUST include worker representative or worker committee member if present
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Discrimination or harassment case without action taken	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

*A6.2 Reasonable accommodation for religious practices is provided.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Adequate prayer /religious areas are provided if requested or mandatory.	Requests are kept, reviewed and decision and reason of decision of accommodation (or no accommodation) is provided to the requestor in a timely manner.	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) 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) 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.		
Priority	Major	Minor	Not Applicable
Reasonable Religious Accommodation requests are refused by management without justification	Prayer /religious areas are provided but not meeting the conditions of the agreement between workers and management	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

## A7) Freedom of Association

### 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	Management Interview	Worker Interview
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 3) No evident presence of a prohibition of association with a trade union	1) There are no recorded episodes of violence, explicit threats of any kind or any other violations of the right to freedom of association. 2) Trade union meeting minutes and financial records, if available, to determine source of funding and materials. 3) Management contributions are limited to providing meeting space and/or meeting materials (such as note taking material). 4) Payroll records confirm that trade union employees are paid the same as other workers in similar job functions 5) Communication records do not show Freedom of association restrictions or Freedom of Association communications are not prohibited 6) Grievance records on Freedom of Association show the grievance is acted upon.	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
			Auditor guidance: sample of interviewed Workers MUST include worker representative or worker committee member if present
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	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	Management Interview	Worker Interview
No evidence of refusal by management to enter negotiations upon request by the trade union certified to represent workers	1) No evidence of refusal by management to enter negotiations upon request by the trade union 2) Auditee participates in good faith in the collective bargaining process with the trade union certified to bargain on behalf of the workers. 3) The Collective Bargaining Agreement terms and conditions are implemented 4) Granting a religious accommodation should be evaluated against the Collective Bargaining Agreement and may vary from the CBA. 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.	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
			Auditor guidance: sample of interviewed Workers MUST include worker representative or worker committee member if present
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

*A7.3 Participants respect the legal right of all workers to peacefully assemble.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
No signs of explicit prohibition of the right of peaceful assembly.	1) 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 2) 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	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	May place reasonable time, place, and manner controls regarding assembly for purposes of maintaining a healthy, safe, and productive work environment		Auditor guidance: sample of interviewed Workers MUST include worker representative or worker committee member if present
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

# A.M Labor Management Systems

## A.M.1 Risk Assessment

*A.M.1.1 An adequate and effective labor compliance process to monitor, identify, understand, and ensure compliance with applicable laws and regulations and customer requirements is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Process <ul style="list-style-type: none"> <li>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"> <li>i) Identify</li> <li>ii) Track</li> <li>iii) Assess</li> <li>iv) Integrate</li> <li>v) Implement</li> <li>vi) Records</li> </ul> </li> <li>2) A documented process is in place to ensure permits are renewed before current permits, licenses and testing expire</li> <li>3) Records               <ul style="list-style-type: none"> <li>a) Accurate and up to date compliance register</li> <li>b) A compliance calendar or reminders/tasks/calendar appointments via an e-mail system.</li> <li>c) Summaries of applicable laws and regulations</li> <li>d) Review of the key customer requirements that impact the operations as these related to the RBA code</li> </ul> </li> </ul>	Applicable	<u>NOT</u> Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*A.M.1.2 An adequate and effective management process to identify and assess labor risks*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Process 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 2) Scope of the risk assessment: a) Every site operation/process b) Physical location c) Young workers are a separate category d) (Foreign and internal) migrant workers are a separate category 3) Records a) Formal risk assessment reports	Applicable	<u>NOT</u> Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

## A.M.2 Control processes

*A.M.2.1 Labor 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*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) A senior representative is assigned responsibility for implementing programs <ul style="list-style-type: none"> <li>a) To ensure compliance with laws and regulations and the requirements of the RBA</li> <li>b) Is authorized to implement programs, process and corrective actions as needed for regulatory compliance and RBA conformance</li> </ul> 2) Responsibilities and authority of each organizational level are recorded in position plans, job descriptions and/or the facility's management system documentation <ul style="list-style-type: none"> <li>a) For normal situations</li> <li>b) For emergency situations</li> </ul>	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*A.M.2.2 Adequate and effective Labor policies and control processes are established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
<p>1) Control measures are in place for identified risks</p> <p>2) Records are securely stored with authorized access only</p> <p>3) Time Recording Devices are present, and all are in working order.</p>	<p>1) <b>Policies:</b> Adequate policies are in place for:</p> <p>a) Freely chosen employment:</p> <ul style="list-style-type: none"> <li>i) no forced, bonded, involuntary or exploitative prison, trafficked or slave labor is used</li> <li>ii) workers are not required to pay Fees, deposits or incur debt as part of the employment</li> <li>iii) when employment has been terminated voluntarily or involuntarily, worker will be paid appropriate amounts for all hours worked.</li> <li>iv) no government issued identification or originals of personal records are held or stored.                             <ul style="list-style-type: none"> <li>(1) In some countries, the local law requires employers to hold foreign and internal migrant workers' personal records. In those cases:                                     <ul style="list-style-type: none"> <li>(a) Process are in place for safe keeping of only those personal records required by law.</li> </ul> </li> </ul> </li> <li>v) freedom of movement</li> </ul> <p>b) Child labor:</p> <ul style="list-style-type: none"> <li>i) child labor prohibition</li> <li>ii) not refuse the worker's job application after the "child" worker's age meets legal requirements</li> <li>iii) <u>If child labor is identified, assistance/remediation is provided</u></li> </ul> <p>c) Young workers / pregnant workers and nursing mothers</p> <ul style="list-style-type: none"> <li>i) Health checks if required by law</li> <li>ii) Identification and assignment of young workers to non-hazardous positions</li> <li>iii) Restriction on time of day worked (Young workers are not allowed night work or overtime)</li> </ul> <p>d) Learners</p> <ul style="list-style-type: none"> <li>i) If applicable, a written policy stating that the Auditee does not hire apprentices/interns/student workers.</li> <li>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.</li> <li>iii) Maximum duration of apprenticeship (not more than 6 months if worker is paid below minimum wage).</li> <li>iv) No agency or intermediary may be used in connection with the recruitment, hiring, arrangement, and management of student workers, interns or apprentices.</li> <li>v) All work is voluntary (including choice of learning placement assignment).</li> <li>vi) Prohibition of use of student workers, interns or apprentices to simply fill a labor shortage.</li> </ul> <p>e) Time off</p> <ul style="list-style-type: none"> <li>i) Hours worked, days off, sick leave, holidays, vacation and paternity/maternity leave.</li> <li>ii) Mandated meal and rest breaks, leave periods, holidays, and vacation days</li> </ul> <p>f) Compensation:</p> <ul style="list-style-type: none"> <li>i) "Pay equals time worked" applies; this means any company-required activity</li> <li>ii) All workers shall be paid no less than the agreed* wage for all regular hours.</li> <li>iii) overtime and other compensation and benefits are paid and are on top of agreed* wage for regular hours</li> <li>iv) Payment made to leavers (resigned workers).</li> </ul> <p>g) Disciplinary practices:</p> <ul style="list-style-type: none"> <li>i) Prohibition of disciplinary wage deductions are in place including "Pay equals time worked"</li> </ul> <p>h) Decent / Humane work</p>	<p>Applicable</p>	<p>Applicable</p>

	<ul style="list-style-type: none"> <li>i) Non-discrimination <ul style="list-style-type: none"> <li>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</li> <li>ii) A commitment to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination 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, accommodation, benefits, rewards, and access to training.</li> </ul> </li> <li>j) Reasonable Religious accommodation <ul style="list-style-type: none"> <li>i) 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 job application.</li> </ul> </li> <li>k) Freedom of Association <ul style="list-style-type: none"> <li>i) Respect of the right of workers to form or enroll in a trade union, or to refrain from doing so</li> <li>ii) Will not interfere with and will not finance a trade union</li> </ul> </li> <li>l) Collective Bargaining <ul style="list-style-type: none"> <li>i) The recognition of the right of workers to bargain collectively, or refrain from doing so</li> </ul> </li> <li>m) Peaceful Assembly <ul style="list-style-type: none"> <li>i) Respect of the right of workers; individually or collectively; to express, promote, pursue, and defend their concerns or ideas; or to refrain from doing so</li> </ul> </li> </ul> <p>2) Effective Control processes:</p> <ul style="list-style-type: none"> <li>a) Each of the policy requirements has an effective implementation (control) process.</li> <li>b) Specific additional control requirements: <ul style="list-style-type: none"> <li>i) Freely chosen employment: <ul style="list-style-type: none"> <li>(1) Determine the specific amount of any fees and expenses paid by each individual foreign and internal migrant worker prior to commencement of work.</li> </ul> </li> <li>ii) Child labor: <ul style="list-style-type: none"> <li>(1) verify the reliability of age records. Age verification must include visual verification of a government recognized photographic identification record.</li> <li>(2) reliable ID verification system to control the workers' access into the facility</li> <li>(3) <u>Child labor assistance/remediation process</u> that is designed to provide for the welfare of the child</li> </ul> </li> <li>iii) Young workers <ul style="list-style-type: none"> <li>(1) Health checks if required by law</li> <li>(2) Restriction on hours worked and time of day worked</li> <li>(3) Identification and assignment of young workers to non-hazardous positions</li> <li>(4) Young workers are not allowed night work or overtime</li> </ul> </li> <li>iv) Hours worked / days off <ul style="list-style-type: none"> <li>(1) Accurately determine</li> <li>(2) Record</li> <li>(3) Manage</li> <li>(4) Control working hours including overtime and days off.</li> </ul> </li> </ul> </li> </ul>		
--	---	--	--



	<ul style="list-style-type: none"> <li>v) Contracts <ul style="list-style-type: none"> <li>(1) Service providers, Labor Agents and Labor Contractors have executed contracts with agreement requirements to ensure conformance with the policies/process.</li> </ul> </li> <li>vi) Record keeping <ul style="list-style-type: none"> <li>(1) appropriate retention (on and off site) and appropriate levels of access to ensure privacy conforming to legal and customer requirements</li> </ul> </li> <li>vii) Risk assessment <ul style="list-style-type: none"> <li>(1) Any identified risk has an action plan to minimize such risk</li> <li>(2) Effectiveness of controls is evaluated on a regular basis</li> <li>(3) Procedural controls are recorded</li> <li>(4) Where controls are not yet in place an implementation plan (with owners and due date) is in place and on track</li> </ul> </li> </ul>		
<b>Additional assistance:</b>			
<b>Site Observations</b>	<b>Record Review</b>	<b>Management Interview</b>	<b>Worker Interview</b>
Not applicable	<ul style="list-style-type: none"> <li>1) <u>Policies</u> <ul style="list-style-type: none"> <li>a) This is applicable for direct and indirect employment workers.</li> <li>b) Scope of policies and process is during recruiting, hiring and employment.</li> <li>c) Freely Chosen Employment <ul style="list-style-type: none"> <li>i) Stating that workers are not required to pay either as one-time or installment payments, collected directly or through wage deductions.</li> </ul> </li> <li>d) Government issued identification and personal documentation <ul style="list-style-type: none"> <li>i) Auditee may request, where permitted, copies of the original records).</li> </ul> </li> <li>e) Child labor <ul style="list-style-type: none"> <li>i) Inspect and cross-reference to verify the validity at least two types of official ID*</li> <li>ii) 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</li> <li>iii) ID types for verification and cross-reference <ul style="list-style-type: none"> <li>(1) Matching photographic ID to worker's face</li> <li>(2) Verification through third-party resources where available, such as Internet resources or local government offices</li> <li>(3) Birth certificate</li> <li>(4) Government-issued personal identification card</li> <li>(5) Driver's license</li> <li>(6) Voting registration card</li> <li>(7) "Official stamped" copy of a school certificate</li> <li>(8) Affidavit from local government representative</li> <li>(9) Foreign and internal national/regional work permit or other government recognized record.</li> </ul> </li> </ul> </li> </ul> </li> </ul>		

- iv) Underage assistance includes
  - (1) Health exam and appropriate action if necessary
  - (2) Completion of compulsory schooling
  - (3) Maintaining the child's income until legally eligible to work
  - (4) 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.
- f) Young workers
  - i) 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
  - ii) Immediate containment, (i.e., re-assignment, putting on day shift only ...not termination) is required in Priority and Major findings regarding young workers
- g) Hours worked / Days off
  - i) Ensure awareness of requirements of compliance with local and national/regional laws and regulations regarding working hours and days off and RBA requirements
  - ii) Integrate legal and RBA requirements
  - iii) Monitor actual performance
  - iv) Use a strategy to ensure conformance with all requirements.
- h) Reasonable Religious Accommodation
  - i) The process must reasonably accommodate group or individual religious practice requests made to management and may include:
    - (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 Process
  - ii) 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.
- i) Freedom of Association
  - i) 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.
- 2) Minimum records on-site:
  - 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 process
  - j) Performance in meeting objectives and targets

	<ul style="list-style-type: none"> <li>k) Reports of inspections by regulatory agencies</li> <li>l) Incident investigations</li> <li>m) Worker grievances</li> <li>n) Training records</li> <li>o) Management System Review minutes and action items</li> <li>p) Corrective action records.</li> <li>q) Conflict of interest declarations are available in personnel files</li> </ul>		
--	---	--	--

Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	<ol style="list-style-type: none"> <li>1. See finding severity definition</li> <li>2. Time records are not accurately adjusted after worker grievance</li> <li>3. 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</li> <li>4. Time records do not match other relevant Auditee records &gt;5% of population</li> </ol>	<ol style="list-style-type: none"> <li>1. See finding severity definition</li> <li>2. Time records not matching other relevant Auditee records for &gt;1% to ≤5% of population</li> </ol>	Not applicable

*A.M.2.3 An adequate and effective Labor training process is established for all managers/workers on all policy/process/job related aspects and performance targets*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Process a) Adequate and effective training to workers/managers: 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 (each policy, process and mgmt. systems element such as responsibilities, risk, grievance...) are covered 2) Records a) Training records include a verification of training effectiveness b) Educational materials c) Learner: training material: An outline of training program and copies of the training material are always available	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

## A.M.3 Communications

*A.M.3.1 An adequate and effective worker/manager (including to solicit and encourage worker participation, input and feedback for improvement), Supplier and customer communication/for labor is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Feedback channels are clearly communicated and visible (suggestion box, etc.)	<ol style="list-style-type: none"> <li>1) Adequate and effective communication/reporting process to:               <ol style="list-style-type: none"> <li>a) Suppliers                   <ol style="list-style-type: none"> <li>i) Correspondence to Supplier management</li> <li>ii) Contract terms and conditions requiring Suppliers to conform to the RBA code</li> </ol> </li> <li>b) Customers                   <ol style="list-style-type: none"> <li>i) 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).</li> <li>ii) Submitting SAQ to customers does not qualify as communication to customers</li> </ol> </li> <li>c) Workers / Managers                   <ol style="list-style-type: none"> <li>i) The minimum communication topics (each policy, process and mgmt. systems element such as responsibilities, risk, grievance...) are covered</li> </ol> </li> </ol> </li> <li>2) Adequate and effective process to obtain worker input and feedback Records               <ol style="list-style-type: none"> <li>a) Communications records include a verification of communication effectiveness</li> <li>b) Input/feedback records</li> <li>c) Written information to workers on how to provide input/feedback for improvement</li> <li>d) Communications/Presentations to Suppliers</li> <li>e) Communications/ Presentations to customers if requested</li> </ol> </li> </ol>	Applicable	Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Examples of worker participation mechanisms: <ul style="list-style-type: none"> <li>a) Worker surveys</li> <li>b) Suggestions boxes</li> <li>c) Worker focus groups</li> <li>d) Joint worker-management committees</li> <li>e) Worker/union representatives</li> <li>f) Process improvement teams.</li> </ul> 2) Worker in this context refers to auditee's workers and workers deployed by the third-party service provider, vocational schools and labor agents and contractors.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*A.M.3.2 An adequate and effective confidential Labor grievance process without fear of reprisal or intimidation is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Grievance 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 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 3) Records: a) Grievance records b) Investigation records c) Workers are provided with written information on how to report grievances	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	Auditor guidance: evidence to show actions have been taken for the grievances may need to spot check 1 or 2 case records.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1) Confirmed grievance without corrective action plan 2) Grievance has not been investigated/addressed within 3 months after being received	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

## A.M.4 Performance Review and Continuous Improvement

### *A.M.4.1 An adequate and effective Labor management Performance review and continuous improvement process is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>1) Process               <ol style="list-style-type: none"> <li>a) Adequate and effective annual process by senior management:                   <ol style="list-style-type: none"> <li>i) Management system review</li> <li>ii) Performance review</li> </ol> </li> <li>b) Formal and communicated indicators, objectives and targets</li> <li>c) Additional action plans if indicator, objective or target is off track</li> <li>d) Timeline: Goals must clearly define the period considered; each goal must include:                   <ol style="list-style-type: none"> <li>i) Time Period: (between base date and target date) must be forward looking</li> <li>ii) Base date: Date from which the goal is being measured</li> <li>iii) Target date: Date in the future when which the goal is intended to be achieved</li> <li>iv) Baseline: the value of what is being measured at the start</li> <li>v) Targeted improvement value: The quantitative value of the goal (numeric and greater than 0)</li> </ol> </li> </ol> </li> <li>2) Evaluation               <ol style="list-style-type: none"> <li>a) On a regular basis not exceeding 2 years but earlier if there is a Significant Change                   <ol style="list-style-type: none"> <li>i) Effectiveness of controls (including control processes)</li> <li>ii) Every program</li> </ol> </li> </ol> </li> <li>3) Records               <ol style="list-style-type: none"> <li>a) System review meetings</li> <li>b) Management review meeting presentation materials/analysis/data</li> <li>c) Formal target, indicator and objective tracking</li> <li>d) Regular progress reporting</li> <li>e) Evaluation reports for (at least)                   <ol style="list-style-type: none"> <li>i) Control effectiveness</li> <li>ii) Training</li> <li>iii) Communication</li> <li>iv) Grievances</li> <li>v) HR practices (hiring, compensation, promotion, nondiscrimination and harassment, humane treatment, ...)</li> </ol> </li> </ol> </li> </ol>	Applicable	Applicable



Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	<p>1) Management review minutes include e.g.</p> <ul style="list-style-type: none"> <li>a) Agenda</li> <li>b) Presentation material (references)</li> <li>c) Date</li> <li>d) Who was present (including senior manager)?</li> <li>e) Progress towards objectives</li> <li>f) Results of Audits</li> <li>g) Completion of corrective/preventive actions</li> <li>h) Risks/issues</li> <li>i) Other information needed to determine the effectiveness of the management system and identify improvement opportunities</li> <li>j) Agreed preventive/corrective actions</li> </ul> <p>2) Process</p> <ul style="list-style-type: none"> <li>a) Scope of indicators, objectives and targets: <ul style="list-style-type: none"> <li>i) Consideration of risk assessment results</li> <li>ii) Legal and regulatory requirements</li> <li>iii) Company standards/requirements.</li> </ul> </li> <li>b) Assignment of owners</li> <li>c) Implementation plans</li> <li>d) Completion dates</li> <li>e) Communication of objectives to workers (as appropriate).</li> <li>f) How frequently progress in meeting objectives is reviewed</li> <li>g) Objectives and targets are clearly designed to achieve continual improvement</li> </ul> <p><u>Auditor guidance: Reporting on this question will include the detail of the current targets and current progress against the targets</u></p>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*A.M.4.2 An adequate and effective Labor self-audit process to periodically assess conformance with the RBA Code and customer requirements*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective <u>self</u> -audit process to periodically assess conformance with: <ul style="list-style-type: none"> <li>a) Applicable regulatory requirements</li> <li>b) RBA Code requirements</li> <li>c) Own policies, standards and management system</li> <li>d) Other requirements to which the facility subscribes</li> </ul> 2) Audit findings are reviewed by senior management.                     3) Records <ul style="list-style-type: none"> <li>a) Self-audit Reports</li> </ul>	Applicable	<u>NOT</u> Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Audit scope: <ul style="list-style-type: none"> <li>a) All areas of the facility,</li> <li>b) All policies, processes, physical conditions and work practices</li> <li>c) Review of records</li> <li>d) Interviews with individuals responsible for SER</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*A.M.4.3 Has established an adequate and effective Labor corrective action process to rectify and close Non-conformances*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective corrective action process is in place which contains the following: <ul style="list-style-type: none"> <li>a) Corrective action reports/plans and tracking tables</li> <li>b) additional actions are taken when a corrective action is off track</li> <li>c) A demonstrated link between the CAP and the performance management objectives and targets.</li> <li>d) All actions must be verifiably closed</li> <li>e) Closure of action items is confirmed by a management representative after verification by the appropriate person</li> <li>f) If <u>any</u> non-conformance is detected, investigation or evaluation, a recorded corrective action is implemented and progress against the corrective action measured, additional actions are taken if the Corrective Action Plan (CAP) is off-track</li> </ul> 2) Records <ul style="list-style-type: none"> <li>a) Records recording the non-conformance</li> <li>b) Corrective action plan for each non-conformance</li> <li>c) Progress reports on the Corrective Action Plan</li> <li>d) Closure verification reports (with mgmt. confirmation)</li> <li>e) Copies of any regulatory citations/violation notices received in the past three years, including any communications with the agencies are available for review.</li> </ul>	Applicable	NOT Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1. Scope of corrective action plan: <ul style="list-style-type: none"> <li>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</li> </ul> 2. Corrective action reports/plans and tracking tables <ul style="list-style-type: none"> <li>a. Root cause analysis of the finding to ensure the system gap is addressed</li> <li>b. Specific corrective actions</li> <li>c. Owners of the action</li> <li>d. Due dates are established to address all Audit issues.</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

## B. HEALTH & SAFETY

### B1) Occupational Safety

*B1.1 All required permits, licenses and test reports for health & safety are in place and communicated timely to government (if required)*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Permits, licenses related to special equipment (such as crane, boiler, forklift, ...) or test results are posted when required 2) Required postings are current and located in public view.	1) All required health & safety permits, licenses and test reports are in place and valid. <ul style="list-style-type: none"> <li>a) Occupational health &amp; safety</li> <li>b) Fire safety</li> <li>c) Occupational health               <ul style="list-style-type: none"> <li>i) Injury logs</li> </ul> </li> <li>d) industrial hygiene permits and licenses               <ul style="list-style-type: none"> <li>i) Use permits</li> </ul> </li> <li>e) machine (safety)</li> <li>f) food, sanitation and housing               <ul style="list-style-type: none"> <li>i) Rented apartments</li> <li>ii) Drinking water</li> <li>iii) Food sample testing</li> </ul> </li> </ul> 2) All government reporting is on time and accurate 3) Professional certificates <ul style="list-style-type: none"> <li>a) Valid certificates for occupational health &amp; safety (e.g., first responders, etc. where required).</li> <li>b) If nurses or doctors are employed or doctor/nurse services are used, a copy of their certificate/license</li> <li>c) Food worker health tests</li> <li>d) Health &amp; safety ERT members have the required qualifications/certifications</li> </ul>	Applicable	Only interview workers if posting or signage of relevant permits, licenses or test reports is required to be posted.
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
Some signage and information may be required to be posted in employee common / break / cafeteria locations.	1) Records <ul style="list-style-type: none"> <li>a) All occupational safety permits and licenses e.g.               <ul style="list-style-type: none"> <li>i) Building occupancy permits</li> <li>ii) Pressure vessel (e.g., boiler) permits</li> <li>iii) Hoist permit</li> <li>iv) Lift permit</li> </ul> </li> <li>b) Occupational safety testing reports e.g.               <ul style="list-style-type: none"> <li>i) Industrial hygiene sampling data</li> <li>ii) Drinking water sampling data</li> <li>iii) Ventilation flow tests</li> </ul> </li> </ul>		

	<ul style="list-style-type: none"> <li>c) All occupational safety permits and licenses e.g. <ul style="list-style-type: none"> <li>i) Fire safety and emergency preparedness</li> </ul> </li> <li>d) Occupational safety testing reports e.g. <ul style="list-style-type: none"> <li>i) Fire safety inspection data</li> </ul> </li> <li>e) Emergency preparedness data All occupational safety permits and licenses e.g. <ul style="list-style-type: none"> <li>i) Occupational health professional licenses</li> </ul> </li> <li>f) Occupational safety testing reports e.g. <ul style="list-style-type: none"> <li>i) Injury logs</li> <li>ii) Respiratory protection (fit tests, medical evaluations)</li> <li>iii) Hearing conservation programs</li> <li>iv) Notice of availability of medical records</li> </ul> </li> <li>g) All industrial hygiene permits and licenses e.g. <ul style="list-style-type: none"> <li>i) Use permits</li> </ul> </li> <li>h) Industrial hygiene testing reports e.g. <ul style="list-style-type: none"> <li>i) Industrial hygiene monitoring logs</li> </ul> </li> <li>i) All machine (safety) permits and licenses e.g. <ul style="list-style-type: none"> <li>i) Machine permits</li> </ul> </li> <li>j) Machine (safety) testing reports e.g. <ul style="list-style-type: none"> <li>i) Machine testing logs</li> </ul> </li> <li>k) Rented apartments must be permitted by the local government</li> <li>l) food, sanitation and housing permits and licenses e.g. <ul style="list-style-type: none"> <li>i) Canteen/kitchen workers have valid health certificates.</li> </ul> </li> <li>m) food, sanitation and housing testing reports e.g. <ul style="list-style-type: none"> <li>i) Drinking water</li> <li>ii) Food worker health tests</li> <li>iii) Food sample testing</li> </ul> </li> <li>n) If local regulations require facility health inspections or other tests or certificates, these are available and valid.</li> </ul> <p>2) Drinking water</p> <ul style="list-style-type: none"> <li>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</li> </ul>		
--	---	--	--

**Additional specific rating:**

Priority	Major	Minor	Not Applicable
<p>1. Reportable occupational accidents, injuries and illnesses are not reported to the governing agency as required by law</p> <p>2. Mandatory government reporting related to serious occupational accidents, injuries and illnesses is in excess of 3 months from report due date</p>	See finding severity definition	See finding severity definition	No permits, license required, test reports or reporting required.
Remote Verification Acceptable:	YES		

*B1.2 Health & safety hazards are identified, assessed, mitigated using the Hierarchy of Controls, which includes eliminating, substituting, controlling through proper design, process and administrative controls and appropriate Personal Protective Equipment (PPE) which is consistently and correctly used*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Engineering controls are used where appropriate 2) Building a) Buildings are structurally sound b) Confined spaces are identified. 3) Fall 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, etc.) c) Workers are provided with appropriate fall protection for work in elevated work areas (roof work, high lift fork trucks, towers, etc.). Buildings are facilitated with tie-off points to provide workers with safe anchor points if they need to attach a harness. 4) Electrical and other energy sources 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	1) Risk mitigation evaluations demonstrating that each hierarchy level has been fully evaluated and reasons why it could not address the risk fully before proceeding to the next hierarchal level 2) Process and administrative controls are in place and effective 3) Confined spaces hazards are evaluated before workers can enter 4) A hot work permit system is in place for welding, cutting and brazing. 5) A safety inspection is performed daily or prior to each use for all industrial powered vehicles 6) Electrical installations and wiring are regularly inspected and maintained to prevent electrical shock hazards (damaged cords and plugs, frayed wiring, missing protective barriers, etc.) 7) Lockout/tag out program is in place for work on equipment where stored energy (electrical, pneumatic, mechanical, ...) or inadvertent start-up could injure workers 8) Adequate and effective pest control program and logs 9) PPE a) PPE adequacy evaluation records b) PPE inventory and replacement records c) PPE inventory, and logs to have new PPE d) PPE inspection records e) Job specific PPE matrix f) Fit test record for respiratory protection equipment	Applicable	Applicable

<p>5) Vehicle</p> <p>a) In areas where powered industrial vehicles are used, pedestrian walkways are clearly delineated and physically separated, where possible, from vehicle operation areas</p> <p>6) PPE</p> <p>a) PPE must be made available and worn properly based on risk assessment or exposure limit value, whichever is more protective of the worker, given the nature of the exposure to occupational hazards.</p> <p>b) PPE (including ERT PPE) is available</p> <p>c) PPE (including ERT PPE) is adequate in good and working condition</p> <p>d) PPE is appropriately stored and accessible</p> <p>e) ERT PPE storage is clearly marked, visible and easily accessible.</p>			
---	--	--	--

**Additional assistance:**

Site Observations	Record Review	Management Interview	Worker Interview

**Additional specific rating:**

Priority	Major	Minor	Not Applicable
<p>1. PPE is not worn or is the wrong type AND there is immediate risk to the person</p> <p>2. ERT PPE is not available</p> <p>3. ERT PPE is not in good condition / working order, sufficient, visible or easily accessible</p> <p>4. Hazardous substances (including hazardous wastes) are used, handled or stored of in a manner with an immediate risk of life, limb or facility</p>	See finding severity definition	See finding severity definition	No PPE is required.
Remote Verification Acceptable:	NO		

*B1.3 Reasonable steps are in place to remove pregnant women/nursing mothers from working conditions with high hazards, minimize any workplace health & safety risks to pregnant women and nursing mothers and provide reasonable accommodations for nursing mothers*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Pregnant workers/nursing mothers are not working in a job which is hazardous to the pregnant worker and her child 2) Reasonable accommodations for nursing mothers are in place: 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	1) Process and administrative controls to minimize the risk identified in pre, during and post-natal risk assessments are adequate and effective 2) Working hour records (or alternative) show nursing mothers can have reasonable time to express milk 3) Personnel files demonstrate <ul style="list-style-type: none"> <li>a) Pregnant worker or nursing mother are only assigned to jobs safe for them</li> <li>b) Risk assessment specific to worker for pre- and postnatal risk</li> </ul>	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Reasonable accommodation to nursing mothers <ul style="list-style-type: none"> <li>a) Location does not need to be a separate dedicated area</li> <li>b) cannot be a toilet stall or a bathroom</li> <li>c) Private</li> <li>d) Close to the workspace</li> <li>e) Clean</li> <li>f) Secure</li> <li>g) Has a water supply (e.g., a sink)?</li> <li>h) Has access to hygienic storage (e.g., a closed clean cupboard)</li> <li>i) Additional breaks for expressing milk (pumping breaks) are not compensated</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Pregnant workers/nursing mothers are present AND working with immediate risk to worker or child	See finding severity definition	See finding severity definition	All male facility/operation
Remote Verification Acceptable:	NO		



## B2) Emergency Preparedness

### *B2.1 Adequate and effective fire detection, alarm and suppression systems are in place.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Detection <ul style="list-style-type: none"> <li>a) Automatic heat and/or smoke detection as required by insurance company</li> <li>b) Detector devices and systems are functioning and well maintained</li> </ul> 2) Alarm <ul style="list-style-type: none"> <li>a) All buildings have a manual or automatic fire alarm and notification system</li> <li>b) Fire alarm control system is free of trouble/supervisory signals</li> <li>c) Fire alarm manual call-points or pull-stations are provided at or along egress routes to exits</li> </ul> 3) Fire suppression <ul style="list-style-type: none"> <li>a) Portable fire extinguishers are installed, with unimpeded access and inspection tags</li> <li>b) automatic fire sprinklers as required by law or insurance company</li> <li>c) Fire hoses (if present) with unimpeded access and inspection tags</li> <li>d) Fire water tank and water pressure are normal</li> </ul> 4) Asbestos-containing fire-suppression materials—for example, blankets—are prohibited.	1) Inspection records <ul style="list-style-type: none"> <li>a) frequency for               <ul style="list-style-type: none"> <li>i) portable fire extinguishers shall be at least monthly.</li> <li>ii) single unit smoke/fire detectors shall be at least every 6 months.</li> <li>iii) all other fire safety equipment shall not be less than that required/recommended by the manufacturer or insurance company whichever is more stringent</li> </ul> </li> </ul> 2) Test records: frequency shall not be less than that required/recommended by the manufacturer or insurance company whichever is more stringent 3) Maintenance records: frequency shall not be less than that required/recommended by the manufacturer or insurance company whichever is more stringent	Applicable	Applicable

**Additional assistance:**

Site Observations	Record Review	Management Interview	Worker Interview
1) Trouble/supervisory alarm signals are usually indicated by orange LED lights 2) 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.	If an insurance inspection has occurred, ask to see a copy.		

**Additional specific rating:**

Priority	Major	Minor	Not Applicable
1. No firefighting equipment 2. No sprinkler or automatic detection system (if required) 3. No alarm or notification system is in place 4. Firefighting equipment AND automatic Detection System AND alarm or notification systems are in place but are critically impaired which poses an immediate risk to life during an emergency	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

*B2.2 Effective emergency preparedness and response programs (plans/process) are established.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Fire a) Combustible storage is minimized and limited to areas with adequate fire detection and protection. b) Flammable and combustible materials are properly stored to prevent the accumulation of vapors. Ignition hazards (e.g., smoking, electrical sparks, open flames, etc.) are eliminated in areas where combustible and flammable materials are stored or used or if there is a flammable atmosphere	1) Process and administrative controls are in place and effective 2) Business continuity and business resumption plans are available, current and adequate 3) Emergency response plan (ERP) is available, current, adequate and reflecting the risk assessment, including contact information for emergency responders. 4) A post-emergency plan is available, current, and adequate which includes incident reporting, root cause investigation, and corrective/preventative actions.	Applicable	Applicable
<b>Additional assistance:</b>			
Site Observations	Record Review	Management Interview	Worker Interview
	1) <u>Current = reflecting the actual situation of the facility/operation</u> 2) ERP minimum elements a) Specific roles b) Available for review upon request by employees.		
<b>Additional specific rating:</b>			
Priority	Major	Minor	Not Applicable
No Emergency Response Plan or critical elements of Emergency Response plan missing	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

*B2.3 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	Management Interview	Worker Interview
<p>1) <u>Clear and unobstructed egress (i.e., exit access, exit, and exit discharge)</u></p> <ul style="list-style-type: none"> <li>a) An adequate number of effective exit routes from every area</li> <li>b) Exit routes are separated by an appropriate distance and do not share a common exit.</li> <li>c) Exit routes are clear of obstructions</li> <li>d) Exit discharges discharge to open space/parking lot, and do not discharge to an enclosed/gated/locked area</li> <li>e) Exits are free of material storage; and enclosures are not used for any other purpose except for egress</li> <li>f) All exit route doors (i.e., exit access doors, exit discharge doors) which serve high occupancy (=&gt;50) or hazardous areas; open in the direction of egress.</li> <li>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.</li> <li>h) 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.</li> <li>i) All Exit Discharge doors must               <ul style="list-style-type: none"> <li>i) be a single motion exit or</li> <li>ii) have Listed Panic Hardware installed which is pushed open in a single motion</li> </ul> </li> </ul> <p>2) <u>Exit signs:</u></p> <ul style="list-style-type: none"> <li>a) Exit signs are provided to mark exits on every floor</li> </ul>	<p>Inspection records for emergency support facilities (emergency lighting, emergency exit signs, evacuation paths, exit enclosures, etc.) show the emergency support facilities are inspected as per insurance requirements or local practice whichever is stricter.</p>	<p>Applicable</p>	<p>Applicable</p>

<ul style="list-style-type: none"> <li>b) Exit signs are illuminated and/or lighted in the event of a power failure</li> <li>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.</li> </ul> <p>3) <u>Emergency lighting:</u></p> <ul style="list-style-type: none"> <li>a) Emergency lighting provided and installed to illuminate means of egress in the event of a power failure.</li> <li>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.</li> <li>c) Either battery or backup generator may power emergency lighting.</li> </ul> <p>4) <u>Separation:</u></p> <ul style="list-style-type: none"> <li>a) Penetrations are limited to sprinkler pipes, standpipes, and electrical services, pipe and duct installation serving the enclosures</li> <li>b) Openings into the enclosures are protected by fire rated doors or window</li> <li>c) Fire doors are in good condition, self-closing, or automatic closing (upon fire alarm or detection of smoke)</li> <li>d) Integrity of exit enclosures is maintained</li> </ul> <p>5) <u>Muster points</u></p> <ul style="list-style-type: none"> <li>a) Muster points have been established in safe locations to enable employee accountability during an emergency.</li> <li>b) Muster points will be both <u>inside</u> (tornado/extreme weather shelter-in-place) and <u>outside</u> (fire, chemical release)</li> </ul> <p>6) <u>Emergency response kits</u> Emergency response kits are easily located and accessible near muster points</p>			
---	--	--	--

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Non-conforming situations for Exit Route doors include: <ul style="list-style-type: none"> <li>a) Multiple steps required to open doors</li> <li>b) Anything requiring a tight grasp</li> <li>c) Rolling doors that open vertically</li> </ul> 2) <u>Auditor must follow at least three randomly selected egress routes out of the building to the assembly/muster point</u>			
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1. No emergency support facilities present or in good operating condition 2. Emergency exit blocked restricting egress which poses an immediate risk to life during an emergency or lacking easy means of egress (i.e., key, badge, code)	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO unless a Minor with only gaps in records or recordation		

*B2.4 Adequate and effective fire and other identified emergency evacuation drills are conducted with all workers and people on site*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective emergency evacuation drill program <ul style="list-style-type: none"> <li>a) All workers</li> <li>b) Every area (including dormitory, cafeteria, warehouse, office areas, productions floors, research and development laboratories, shipping/receiving)</li> <li>c) Emergency drills must be executed at least annually or as required by local law whichever is more stringent</li> <li>d) All work shifts</li> <li>e) One drill that is conducted at night, while it is dark outside</li> <li>f) Fire: frequency is at least annual</li> <li>g) Other identified emergency evacuations: frequency determined through risk-assessment</li> </ul> 2) ERP drill evaluation reports	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Emergency drill = stop work, evacuate, muster points, roll call		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
No emergency evacuation drill held in last 2 years or since start of operations of site or after a Significant Change	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

### B3) Occupational Injury and Illness

*B3.1 Work related accidents, near-misses and illnesses are reported, tracked, accurate, investigated and analyzed*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) All reportable and non-reportable accidents, incidents and near misses are reported, recorded, accurate and investigated to minimize the potential for future occurrence. 2) Occupational Injury and illness data including surveillance data is current and accurate 3) All accidents and incidents are investigated and analyzed 4) Trend analysis of the occupational Injury and illness data is performed at least annually.	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	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.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	No injuries, accidents, incidents or illnesses
Remote Verification Acceptable:	YES		



*B3.2 Adequate first response equipment and first aid kits to provide medical treatment for injured or ill workers are available*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) First Aid kits <ul style="list-style-type: none"> <li>a) Appropriate and completely stocked placed /assigned first aid kits are available in designated locations.</li> <li>b) First aid kits are unlocked or if locked, first responder can always access the key.</li> </ul> 2) First Response Equipment <ul style="list-style-type: none"> <li>a) Appropriate and well-maintained first response equipment is available in designated locations.</li> </ul> 3) Onsite emergency occupational medical clinic <ul style="list-style-type: none"> <li>a) If applicable, an occupational medical clinic is adequately staffed and supplied to respond to injuries</li> <li>b) If the medical clinic is not open or operated 24 hours per day, alternative resources such as outside medical services are communicated to employees</li> </ul> 4) No asbestos blanket	1) First Aid / First Response kits/equipment with adequate supplies are available to employees in designated areas. 2) In-house infirmary or clinic: <ul style="list-style-type: none"> <li>a) An operations log of onsite emergency occupational medical clinic is available and up to date (access might be restricted due to privacy laws).</li> <li>b) Supplies for the onsite occupational medical clinic are available, adequate and inspected.</li> </ul> 3) Frequency is at least monthly for all inspections 4) Records <ul style="list-style-type: none"> <li>a) Onsite occupational medical clinic inventory list</li> <li>b) First aid kits have inventory list</li> <li>c) Inspection tracking records are available and up to date.</li> </ul>	Applicable	Applicable
<b>Additional assistance:</b>			
Site Observations	Record Review	Management Interview	Worker Interview
	1) First response equipment = e.g., fire blanket, eye wash, emergency shower, etc.		
<b>Additional specific rating:</b>			
Priority	Major	Minor	Not Applicable
1) No first response equipment	See finding severity definition	See finding severity definition	Not Applicable
2) No first aid kits			Not Applicable
3) Critical elements of in-house infirmary or clinic are missing			
Remote Verification Acceptable:	YES		

## B4) Industrial Hygiene

*B4.1 Worker exposure to chemical, biological and physical agents are identified, evaluated, and controlled, according to the hierarchy of controls.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Chemicals (including hazardous substances) are adequately and effectively <ul style="list-style-type: none"> <li>a) Categorized</li> <li>b) Handled</li> <li>c) Stored</li> <li>d) Moved <u>within</u> a single facility/ multiple facility.</li> <li>e) Access is controlled</li> <li>f) Potential employee exposure methods are adequate and effective such as               <ul style="list-style-type: none"> <li>i) Segregation</li> <li>ii) Secondary containment</li> <li>iii) Ventilation</li> <li>iv) Fire protection</li> <li>v) Appropriate storage cabinets</li> </ul> </li> </ul> 2) Adequate engineering controls to reduce or eliminate worker exposure to chemical, biological and physical agents are in place and effective           3) During normal working hours, workplace is free from obvious odor, visible fume, dust, and other conditions leading to potential unhealthy feelings	1) Adequate and effective recorded program to control the identified potential hazards to chemical, biological, or physical agents is place           2) Process and administrative controls are in place and effective           3) 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.           4) Chemicals (including Industry Focus Process Chemicals (IFPC)) <ul style="list-style-type: none"> <li>a) Accurate chemical inventory records are maintained and accurate</li> <li>b) Inspection records of hazardous substances and their points of storage and use are maintained and accurate.</li> <li>c) Copies of hazardous substances inventory, manifests and shipping papers are maintained and accurate.</li> <li>d) Approvals for purchase of hazardous chemicals and for all new purchases of hazardous chemicals prior to use.</li> <li>e) Evaluations of chemicals (including hazardous chemicals) of less hazardous or non-hazardous alternatives including Greenhouse Gas and ozone depletion impact.</li> <li>f) Adequate and effective process to track, review, and approve the use of all hazardous chemicals</li> <li>g) Evaluation for elimination and/or substitution or worker isolation records for all IFPC</li> <li>h) Administrative controls or PPE are used as designed controls for substances containing IFPC only in temporary circumstances or in supplement to engineering controls.</li> </ul>	Applicable	Applicable

--

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
1) 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, safety shoes, long sleeves, chemically resistant gloves, and eye protection 2) Engineering controls = e.g., exhaust ventilation, enclosures, etc. 3) If obvious odor, visible fume, dust, and other conditions leading to potential unhealthy feelings exist, auditor should perform detail interview and inspections.	1) Industry Focus Process Chemicals (IFPC) include chemical mixtures that contain any of the following ingredients: a) 1-Bromopropane (CAS 106-94-5) b) Benzene (71-43-2) c) Dichloromethane (Methylene Chloride) (75-09-2) d) Methanol (67-56-1) e) n-Hexane (110-54-3) f) N-Methyl-Pyrrolidone (NMP) (872-50-4) g) Tetrachloroethylene (127-18-4) h) Toluene (108-88-3) i) Trichloroethylene (79-01-6) 2) Surveillance records are not limited to respiratory, but various exposures, such as skin contact, hearing loss, radiation, etc. 3) Administrative controls = limiting worker exposure time; job rotation, etc.		Interview workers who work with hazardous substances or are responsible for hazardous chemical storage, handling and use
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition  No consideration of combined exposure to multiple chemicals	See finding severity definition	Not applicable
Remote Verification Acceptable:	NO		

## B5) Physically Demanding Work

### *B5.1 Worker exposure to the hazards of physically demanding work is controlled effectively*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Adequate engineering controls to reduce or eliminate physically demanding work are in place and effective	Process and administrative controls are in place and effective	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
Engineering controls = e.g., Palletizers, lift tables, adjustable work platforms, etc.	1) Physical demanding work=e.g., Heavy or repetitive lifting, prolonged standing, etc. 2) Administrative controls=e.g., limiting worker exposure time; job rotation, etc.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	No physically demanding work
Remote Verification Acceptable:	NO		

## B6) Machine Safeguarding

*B6.1 An adequate and effective machine-safeguarding program is implemented, and workers operate machinery safely*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
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) Process and administrative controls are in place and effective 2) Work instructions (if necessary or required) at machine (or within proximity). 3) Safe machine operation documentation at machine (or within proximity).	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
Machine safeguards=e.g., machine pinch points, points-of-operation, rotating shafts, flywheels, chain drives, motor-driven movement, etc.	Machine = any equipment with at least one moving part. Machines in scope are machine operated by workers to perform their main task.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Worker operates machine unsafely with immediate risk of life or limb	See finding severity definition	See finding severity definition	No physical machine hazards
Remote Verification Acceptable:	YES, if minor, otherwise NO.		

## B7) Food, Sanitation and Housing

### *B7.1 Worker housing is clean, safe, and well-maintained and meet international housing standards*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Environment <ul style="list-style-type: none"> <li>a) Worker housing and sanitary facilities (common areas, hallways, rest rooms, etc.) are clean and properly maintained.</li> <li>b) Clear, well-lit stairwells to allow for safe exit from dormitories</li> <li>c) Building is heated in the winter (if applicable).</li> <li>d) Windows provide light and ventilation.</li> <li>e) Adequate lighting</li> <li>f) Safe and sufficient electricity sockets are provided.</li> <li>g) Sufficient space is available for each worker</li> <li>h) Individually secured storage accommodations</li> </ul> 2) Structure and lay-out <ul style="list-style-type: none"> <li>a) All facilities are separated by gender (except spouse rooms) and adequate in number.</li> <li>b) Lodging and cooking facilities are separate</li> <li>c) Adequate domestic waste disposal facilities</li> </ul> 3) Surveillance <ul style="list-style-type: none"> <li>a) All dorms monitored equally</li> </ul>	1) Process and administrative controls are in place and effective 2) Sanitation program tracking records 3) Preventive maintenance program log. 4) For rented apartments, performs a risk assessment and updates if there is a Significant Change, on-site inspections and emergency procedures 5) <u>The Worker housing 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 workers, these standards will still apply)</u>	Applicable	Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
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 worker at any time			
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Worker housing is unsafe with immediate risk of loss of facility, life or limb	See finding severity definition	See finding severity definition	No Worker housing
Remote Verification Acceptable:	NO		

*B7.2 Bathrooms, employee spaces, cafeterias, food areas are safe, clean, well maintained, and well managed*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Environment a) Bathrooms, employee spaces, prayer or religious areas, cafeterias, food areas are clean and well maintained. b) Bathrooms, cafeterias and food areas are provided with adequate hand washing facilities. 2) Food workers a) Food service workers wear masks, hairnets and gloves as necessary to prevent food contamination. 3) Food storage: 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, etc. d) Food is used or disposed of before the marked expiration date	1) Process 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 2) Records 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.	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Bathrooms, employee spaces, cafeterias, food areas are unsafe with immediate risk of loss of facility, life or serious injury	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	NO		



# B.M Health & Safety Management Systems

## B.M.1 Risk Assessment

*B.M.1.1 An adequate and effective Health & Safety compliance process to monitor, identify, understand, and ensure compliance with applicable laws and regulations and customer requirements is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Process a) Adequate and effective <u>quarterly</u> compliance process to maintain a current understanding of applicable legal and customer requirements: i) Identify ii) Track iii) Assess iv) Integrate v) Implement vi) Records b) A documented process is in place to ensure permits are renewed before current permits, licenses and testing expire 2) Records 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 d) Review of the key customer requirements that impact the operations as these related to the RBA code	Applicable	Not Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*B.M.1.2 An adequate and effective management process to identify and assess Health & Safety risks*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not applicable	<ol style="list-style-type: none"> <li>1) 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).                             <ol style="list-style-type: none"> <li>a) Harm to life</li> <li>b) Property</li> <li>c) Risk assessment minimum elements:                                     <ol style="list-style-type: none"> <li>i) Fire</li> <li>ii) Chemical spill (if large quantity or especially hazardous chemicals are used)</li> <li>iii) Earthquake (if in earthquake zone)</li> <li>iv) Severe weather (e.g., rain, flood, typhoon, frost, snow, or other conditions as appropriate to the facility location, etc.).</li> <li>v) Workplace violence</li> <li>vi) Strike</li> <li>vii) Asbestos / lead</li> </ol> </li> </ol> </li> <li>2) Scope of risk assessment:                             <ol style="list-style-type: none"> <li>a) Every task</li> <li>b) Every site operation/process</li> <li>c) Every Physical location</li> <li>d) Young workers are a separate category</li> <li>e) Foreign and internal migrant workers are a separate category</li> </ol> </li> <li>3) The risk assessment is current and updated when there is a Significant Change</li> <li>4) Risk are addressed through the Hierarchy of Controls                             <ol style="list-style-type: none"> <li>a) Elimination</li> <li>b) Substitution</li> <li>c) Engineering controls</li> <li>d) Process and Administrative controls</li> <li>e) Adequate and effective PPE</li> </ol> </li> <li>5) Specific requirements relevant to:                             <ol style="list-style-type: none"> <li>a) Pregnant workers and nursing mothers                                     <ol style="list-style-type: none"> <li>i) Before a pregnancy is reported: general risk assessment (potential hazards to expecting mothers)</li> <li>ii) After pregnancy is reported: a worker-specific risk assessment of the worker's job to assess risk to mother and fetus</li> <li>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</li> </ol> </li> <li>b) Chemical, biological, or physical agents.                                     <ol style="list-style-type: none"> <li>i) Based on associated industrial hygiene sampling and testing</li> <li>ii) Risk assessment must include exposure to multiple chemicals</li> </ol> </li> </ol> </li> </ol>	Applicable	Not Applicable

	<ul style="list-style-type: none"> <li>c) Machine risk assessment <ul style="list-style-type: none"> <li>i) a method to identify machine safeguarding needs (pre-purchase/pre-installation hazard review of all machinery.)</li> </ul> </li> <li>6) Each identified risk has an action to minimize such risk through the Hierarchy of Controls and improvement objective.</li> </ul>		
<b>Additional assistance:</b>			
Site Observations	Record Review	Management Interview	Worker Interview
	<ul style="list-style-type: none"> <li>1) Pregnant workers and nursing mothers <ul style="list-style-type: none"> <li>a) <u>General and specific</u> to worker risk assessment must include assessment of: <ul style="list-style-type: none"> <li>i) Lifting/carrying heavy loads.</li> <li>ii) Standing or sitting still for long lengths of time.</li> <li>iii) Exposure to infectious diseases</li> <li>iv) Exposure to lead.</li> <li>v) Exposure to toxic chemicals.</li> <li>vi) Work-related stress.</li> <li>vii) Workstations and posture.</li> <li>viii) Exposure to radioactive material.</li> <li>ix) Threat of violence in the workplace.</li> <li>x) Long working hours.</li> <li>xi) Extreme heat</li> <li>xii) Excessive noise</li> <li>xiii) Night shifts</li> </ul> </li> <li>b) <u>Prenatal risk assessment must include:</u> <ul style="list-style-type: none"> <li>i) Working with organic mercury.</li> <li>ii) Working with radioactive materials</li> </ul> </li> </ul> </li> <li>2) Young workers are a separate category</li> <li>3) Chemical, biological, or physical agents. <ul style="list-style-type: none"> <li>a) Exposure to multiple chemicals can be either an exposure to multiple chemicals by a single route or exposure to multiple chemicals by multiple routes. A route can inhalation, ingestion, skin exposure, etc.</li> </ul> </li> <li>7) <u>Significant Change is when a new chemical, biological, or physical agent is introduced into the work environment, or when an existing process is changed that may trigger a H&amp;S risk.</u></li> </ul>		
<b>Additional specific rating:</b>			
<b>Priority</b>	<b>Major</b>	<b>Minor</b>	<b>Not Applicable</b>
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

## B.M.2 Control processes

*B.M.2.1 Health & Safety 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*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Easily identifiable personnel (e.g., badges, different colored attire/hard-hat, and office/work area signage): a) ERT b) First responders	1) Senior representative a) A senior representative is assigned responsibility for implementing programs i) To ensure compliance with laws and regulations and the requirements of the RBA code ii) Is authorized to implement programs, process and corrective actions as needed for regulatory compliance and RBA conformance 2) Assignment a) Responsibilities and authority of each organizational level are recorded in position plans, job descriptions and/or the facility's management system documentation i) For normal situations ii) For emergency situations 3) ERT assignment a) An emergency response team (ERT) is formed at each facility that shall be available during all working shifts i) The ERT shall have the obligation and authority to direct the Auditee's response to emergencies to ensure the protection of worker health & safety, the environment, and property 4) First Responders a) The facility has assigned a team of trained/certified first responders.	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) ERT members = workers involved in the control, cleanup and disposal of hazardous materials or other emergency response process (e.g., firefighting). In some cases, an ERT might not exist, the justification must be available and valid. 2) It is possible that the role of trained/certified first responders is performed by onsite medical professional team		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1) No ERT in place, if ERT required (by law or risk assessment) 2) No first responders or process	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*B.M.2.2 Adequate and effective Health & Safety policies and control processes are established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
	<p>1) <u>Policies:</u> Adequate policies are in place for:</p> <ul style="list-style-type: none"> <li>a) Pregnant woman and nursing mothers                             <ul style="list-style-type: none"> <li>i) Adequate and effective policies and process are in place to minimize the Health &amp; Safety impact in pregnant woman and nursing mothers</li> </ul> </li> <li>b) First response</li> <li>c) Chemical (including hazardous chemicals), biological, or physical agents.                             <ul style="list-style-type: none"> <li>i) Selection processes for all new chemicals include a thorough evaluation of less hazardous or non-hazardous alternatives including Greenhouse Gas and ozone depletion impact.</li> </ul> </li> </ul> <p>2) <u>Effective Control processes:</u></p> <ul style="list-style-type: none"> <li>a) Each of the policy requirements has an effective implementation (control) process.</li> <li>b) Specific additional control requirements:                             <ul style="list-style-type: none"> <li>i) PPE process                                     <ul style="list-style-type: none"> <li>(1) Adequate and effective process is implemented to assess worker safety hazards and determine appropriate PPE for specific job tasks and/or areas of the facility.</li> <li>(2) PPE requisition and renewal process</li> <li>(3) Adequate and effective notification and enforcement process for PPE use is in place</li> </ul> </li> <li>ii) Reasonable accommodation to nursing mothers                                     <ul style="list-style-type: none"> <li>(1) Provide reasonable break time for a worker to express breast milk for her nursing child up to one year after the child's birth each time such worker has need to express the milk.</li> <li>(2) 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</li> </ul> </li> <li>iii) Adequate fire detection, alarm and suppression                                     <ul style="list-style-type: none"> <li>(1) 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</li> </ul> </li> <li>iv) Emergency exit access, exits, and exit discharge                                     <ul style="list-style-type: none"> <li>(1) Adequate and effective process to ensure effective emergency exit access, exits and exit discharge with unobstructed egress in in place</li> </ul> </li> <li>v) Occupational accidents, incidents, near-misses and illnesses                                     <ul style="list-style-type: none"> <li>(1) A system for workers to report health &amp; safety incidents and near misses, as well as a system to investigate, track, and manage such reports.</li> <li>(2) All reportable and non-reportable accidents are tracked; recorded and investigated to minimize the potential for future occurrence.</li> <li>(3) Occupational injury and illness data are available for review including medical surveillance data</li> <li>(4) Analysis   <ul style="list-style-type: none"> <li>(a) All accidents are investigated and analyzed for corrective and preventive actions</li> <li>(b) Trend analysis of the occupational Injury and illness data is performed on a regular basis, at least annually and corrective actions are identified and implemented</li> </ul> </li> </ul> </li> </ul> </li> </ul>	Applicable	Applicable

	<ul style="list-style-type: none"> <li>(5) Appropriate preventive action as a result of medical surveillance or injury: <ul style="list-style-type: none"> <li>(a) Worker is removed from the current job immediately and offered another position in the facility.</li> <li>(b) Auditee is prohibited from terminating the labor contract with the worker due to the medical surveillance results.</li> <li>(c) Auditee shall provide medical treatment to the worker.</li> <li>(d) Auditee shall provide re-examination to the worker.</li> </ul> </li> <li>vi) Auditee shall cover the medical treatment, re-examination, and rehabilitation cost for the worker.</li> <li>vii) First responders <ul style="list-style-type: none"> <li>(1) Adequate and effective first response process indicating severity of medical emergency and response (first aid, infirmary, local external hospital).</li> </ul> </li> <li>viii) First aid kits <ul style="list-style-type: none"> <li>(1) Maintenance process: Adequate and effective maintenance process is in place for inspection, maintenance, upkeep and stocking of all first response equipment and first aid kits</li> </ul> </li> <li>ix) Chemical (including hazardous chemicals), biological, or physical agents. <ul style="list-style-type: none"> <li>(1) Adequate and effective process for all hazardous chemicals Industry Focus Process Chemicals (IFPC) to track, review, approve for use and approve for all new purchases prior to use.</li> <li>(2) Adequate and effective recorded program to control the identified potential hazards to chemical, biological, or physical agents is place and follows the hierarchy of controls in a documented gated process, demonstrating that each hierarchy level has been fully evaluated and reasons why it could not address the risk fully before proceeding to the next hierarchal level</li> <li>(3) A prioritized review and selection process to eliminate substitute or isolate workers from all IFPCs.</li> </ul> </li> <li>x) Physically demanding work <ul style="list-style-type: none"> <li>(1) Adequate and effective recorded program to control the identified potential hazards of physical demanding work is place and follows the hierarchy of controls in a documented gated process, demonstrating that each hierarchy level has been fully evaluated and reasons why it could not address the risk fully before proceeding to the next hierarchal level</li> <li>(2) Program encourages responses to early reporting of discomfort.</li> </ul> </li> <li>xi) Machine safety <ul style="list-style-type: none"> <li>(1) Appropriate method is used to ensure that safeguards are installed as needed to control the identified hazards and follows the hierarchy of controls in a documented gated process, demonstrating that each hierarchy level has been fully evaluated and reasons why it could not address the risk fully before proceeding to the next hierarchal level,</li> <li>(2) Regular inspection and preventive maintenance of a machine, its safeguards and emergency stops.</li> </ul> </li> <li>xii) Worker housing (if applicable) <ul style="list-style-type: none"> <li>(1) Adequate and effective cleaning and sanitation program is in place.</li> <li>(2) Adequate and effective preventive maintenance program (including emergency response supporting facilities) is in place</li> <li>(3) On-site inspections and emergency process by authorized personnel</li> </ul> </li> <li>xiii) Bathrooms, employee spaces cafeterias and food areas <ul style="list-style-type: none"> <li>(1) Safe food handling process and hygiene standards (in refrigeration, storage, and preparation areas) are in place and followed in cafeterias.</li> <li>(2) Adequate and effective cleaning and sanitation program is in place.</li> <li>(3) Adequate and effective preventive maintenance program (including emergency response supporting facilities) is in place</li> </ul> </li> </ul>		
--	---	--	--

**Additional assistance:**

Site Observations	Record Review	Management Interview	Worker Interview
	<ul style="list-style-type: none"> <li>1) PPE process <ul style="list-style-type: none"> <li>a) Hazards such as high noise, chemical use, heavy equipment use, awkward positions, work at heights, overhead hazards, etc. should all be evaluated</li> <li>b) PPE notification and enforcement process could include: <ul style="list-style-type: none"> <li>i) Signs and labels</li> <li>ii) Regular enforcement by supervisors</li> <li>iii) Work area inspections</li> </ul> </li> </ul> </li> <li>2) Pregnant workers and nursing mothers <ul style="list-style-type: none"> <li>a) Applies to all types of workers (direct, indirect, dispatched, young, interns, apprentices, ...)</li> </ul> </li> <li>3) Reasonable accommodation to nursing mothers <ul style="list-style-type: none"> <li>a) Location does not need to be a separate dedicated area</li> <li>b) Location for breastfeeding activities: <ul style="list-style-type: none"> <li>i) Not be a toilet stall or a bathroom</li> <li>ii) Private.</li> <li>iii) Close to the workspace</li> <li>iv) Clean</li> <li>v) Secure</li> <li>vi) Has access to water</li> <li>vii) Has access to hygienic storage (e.g., a closed clean cupboard)</li> </ul> </li> </ul> </li> <li>4) First responders <ul style="list-style-type: none"> <li>a) Injured workers are then sent to off-site medical facilities for further treatment as needed</li> </ul> </li> <li>5) Physically demanding work <ul style="list-style-type: none"> <li>a) A review and trend analysis of injuries related to physical demands of job duties.</li> <li>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 recorded).</li> <li>c) Periodic ergonomic task analyses</li> </ul> </li> <li>6) Machine safety <ul style="list-style-type: none"> <li>a) Records demonstrating regular inspection and preventive maintenance of machine are available for review</li> </ul> </li> </ul>		

**Additional specific rating:**

Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

*B.M.2.3 An adequate and effective Health & Safety training process is established for all managers/workers on all policy/process/job related aspects and performance targets*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	<p>1) Process</p> <ul style="list-style-type: none"> <li>a) Adequate and effective training to workers/managers:                             <ul style="list-style-type: none"> <li>i) New employee orientation plan</li> <li>ii) Training needs analysis</li> <li>iii) Training plan</li> <li>iv) Training material</li> <li>v) Training records</li> <li>vi) Training frequency</li> <li>vii) Training efficiency verification</li> </ul> </li> <li>b) Minimum training topics are covered with a minimum of:                             <ul style="list-style-type: none"> <li>i) mechanical, electrical, chemical, fire, and physical hazards</li> <li>ii) The correct use of appropriate PPE</li> <li>iii) Types of potential emergencies that may occur at their work location and what to do during an emergency, including Internal and external muster points.</li> <li>iv) Machine safety and the use of safeguards and emergency stops.</li> <li>v) Reporting injuries and illnesses</li> <li>vi) Hazardous atmospheres and confined space work process prior to entry of confined spaces</li> <li>vii) Lock out-tag out process</li> <li>viii) Specific training for ERT, first responders and medical professionals                                     <ul style="list-style-type: none"> <li>(1) Emergency responders are trained on an annual basis.</li> <li>(2) Training will be dependent on responsibilities during an emergency</li> </ul> </li> </ul> </li> <li>c) Training is provided to all workers prior to the beginning of work and regularly thereafter as per the training program.</li> <li>d) Workers responsible for storage, clean up or disposal of chemical releases receive specialized training.</li> <li>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 were permitted by local law</li> </ul> <p>2) Records</p> <ul style="list-style-type: none"> <li>a) Training records include a verification of training effectiveness</li> <li>b) Educational materials</li> </ul>	Applicable	Applicable



Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Good training program practice <ul style="list-style-type: none"> <li>a) H&amp;S training needs analysis is conducted and is recorded</li> <li>b) A training matrix has been developed following the training needs analysis (including but not limited to mechanical, electrical, chemical, fire, and physical hazards)</li> <li>c) A training plan is in place, building on the training matrix</li> <li>d) A training program with materials and training records is in place, adequate and up to date.</li> <li>e) Training program is up to date and maintained through a compliance calendar, work-order systems, and computer-based e-mail/calendar system.</li> <li>f) Refresher training schedules are established and implemented as per schedule</li> <li>g) Updates should be made whenever new operations, chemicals, machines, or process are added in the facility or change significantly</li> <li>h) 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)</li> </ul> 2) 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 process (lock-out/tag-out, chemical mixing), and engineering controls (ventilation, point of operation machine guarding, building sprinkler systems).		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1) No training program and/or workers not trained prior to the beginning of work	See finding severity definition	See finding severity definition	Not Applicable
2) ERT/First responder training does not meet minimum requirements for their role			Not Applicable
Remote Verification Acceptable:	NO		

## B.M.3 Communications

*B.M.3.1 An adequate and effective worker/manager program (including to solicit and encourage worker participation, input and feedback for improvement), visitor and Supplier and customer communication/reporting process for Health & Safety is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Feedback channels are clearly communicated and visible (e.g., suggestion box, etc.) 2) Health & Safety communication clearly posted in the facility or placed in a location identifiable and accessible by workers 3) Appropriate signs, placards and labels identifying hazards (chemical, physical, biological, vehicular, etc.) 4) Potential workplace hazards that workers are exposed to are clearly posted in the facility or placed in a location identifiable and accessible by workers 5) 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 6) Adequate and effective signage is observed with emergency number(s), emergency team and emergency evacuation and response plan. 7) Maps are posted throughout the facility which clearly identify exit routes and muster points in the correct orientation	1) Adequate and effective worker/manager, visitor, Supplier and customer communication/reporting process to Suppliers is in place a) Suppliers i) Correspondence to Supplier management ii) Contract terms and conditions requiring Suppliers to conform to the RBA code b) Customers i) Health & Safety practices and performance (1) Accident, incidents and near miss statistics ii) Submitting SAQ to customers does not qualify as disclosure/communication to customers c) Workers / managers i) Adequate and effective process to obtain worker input and feedback ii) The minimum communication topics (each policy, process and mgmt. systems element such as responsibilities, risk, grievances) are covered (1) Hazard communication process: all hazards present at the site and action promoting of a safe workplace. (2) Internal and external muster points d) Visitors (1) General Health & Safety emergency process, general awareness and rules (2) Internal and external muster points 2) Records a) Communications records include a verification of communication effectiveness b) Input/feedback records c) Written information to workers on how to provide input/feedback for improvement d) Communications/presentations to Suppliers e) Communications/ presentations to customers if requested f) Communications to visitors (e.g., upon registration at reception / gate)	Applicable	Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Examples of worker participation mechanisms: <ul style="list-style-type: none"> <li>a) Worker surveys</li> <li>b) Suggestions boxes</li> <li>c) Worker focus groups</li> <li>d) Joint worker-management committees</li> <li>e) Worker/union representatives</li> <li>f) Process improvement teams.</li> </ul> 2) Worker in this context refers to auditee's workers and workers deployed by the third-party service provider, vocational schools and labor agents and contractors.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*B.M.3.2 An adequate and effective confidential Health & Safety grievance without fear of reprisal or intimidation is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Grievance channels are clearly communicated 2) Internal communication of the grievance mechanism must be in a language the workers can understand and visible 3) A mechanism to raise safety concerns is clearly visible	1) Process <ul style="list-style-type: none"> <li>a) Adequate and effective process to anonymously report grievances without fear of reprisal, which is internal (for workers and staff) and external (for workers of suppliers, local community or interested actors and whistleblowers)</li> <li>b) Clear grievance channels so anyone is comfortable reporting grievances and so that reporting is encouraged</li> <li>c) Safety concern notification                             <ul style="list-style-type: none"> <li>i) Adequate and effective program to receive, review and respond to safety concerns reported. (e.g., incentive systems, etc.).</li> <li>i) Workers shall be encouraged to raise safety concerns including early reporting of discomfort.</li> </ul> </li> </ul> 2) Investigation and actions <ul style="list-style-type: none"> <li>a) Auditee shall promptly investigate the validity of the any grievance</li> </ul> 3) Records: <ul style="list-style-type: none"> <li>a) Grievance records</li> <li>b) Investigation records</li> <li>c) Workers are provided with written information on how to report grievances</li> <li>d) Safety concern logs, evaluation records and action plans</li> </ul>	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	Auditor guidance: evidence to show actions have been taken for the grievance may need to spot check 1 or 2 case records.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1) Confirmed grievance without corrective action plan 2) Grievance has not been investigated/addressed within 3 months after being received	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

## B.M.4 Performance Review and Continuous Improvement

### *B.M.4.1 An adequate and effective Health & Safety management performance review and continuous improvement process is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>1) Process               <ol style="list-style-type: none"> <li>a) Adequate and effective annual process by senior management:                   <ol style="list-style-type: none"> <li>i) Management system review</li> <li>ii) Performance review</li> </ol> </li> <li>b) Formal and communicated indicators, objectives and targets</li> <li>c) Additional action plans if indicator, objective or target is off track</li> <li>d) Timeline: Goals must clearly define the period considered; each goal must include:                   <ol style="list-style-type: none"> <li>i) Time Period: (between base date and target date) must be forward looking</li> <li>ii) Base date: Date from which the goal is being measured</li> <li>iii) Target date: Date in the future when which the goal is intended to be achieved</li> <li>iv) Baseline: the value of what is being measured at the start</li> <li>v) Targeted improvement value: The quantitative value of the goal (numeric and greater than 0)</li> </ol> </li> </ol> </li> <li>2) Evaluation               <ol style="list-style-type: none"> <li>a) On a regular basis not exceeding 2 years but earlier if there is a Significant Change                   <ol style="list-style-type: none"> <li>i) Effectiveness of controls (including control processes)</li> <li>ii) Every program</li> </ol> </li> </ol> </li> <li>3) Records               <ol style="list-style-type: none"> <li>a) System review meetings</li> <li>b) Management review meeting presentation materials/analysis/data</li> <li>c) Formal target, indicator and objective tracking</li> <li>d) Regular progress reporting</li> <li>e) Preventive and corrective action plan following the review</li> <li>f) Evaluation reports for (at least)                   <ol style="list-style-type: none"> <li>i) Accidents, incidents, medical surveillance and trend analysis</li> <li>ii) ERP drill plan</li> <li>iii) Control effectiveness (PPE, physically demanding work, machine safety, chemical, physical and biological agents, etc.)</li> <li>iv) Training</li> <li>v) Communication</li> <li>vi) Grievance and safety concerns</li> </ol> </li> </ol> </li> </ol>	Applicable	Not Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Management review minutes include e.g. <ul style="list-style-type: none"> <li>a) Agenda</li> <li>b) Presentation material (references)</li> <li>c) Date</li> <li>d) Attendees (including senior manager)?</li> <li>e) Progress towards objectives</li> <li>f) Results of Audits</li> <li>g) Completion of corrective/preventive actions</li> <li>h) Risks/issues</li> <li>i) Other information needed to determine the effectiveness of the management system and identify improvement opportunities</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*B.M.4.2 An adequate and effective Health & Safety self-audit process to periodically assess conformance with the RBA Code and customer require.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective <u>self</u> -audit process to periodically assess conformance with: <ul style="list-style-type: none"> <li>a) Applicable regulatory requirements</li> <li>b) RBA Code requirements</li> <li>c) Own policies, standards and management system</li> <li>d) Other requirements to which the facility subscribes</li> </ul> 2) Audit findings are reviewed by senior management.                     3) Records <ul style="list-style-type: none"> <li>a) Self-audit reports</li> </ul>	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Audit scope: <ul style="list-style-type: none"> <li>a) All areas of the facility,</li> <li>b) All policies, processes, physical conditions and work practices</li> <li>c) Review of records</li> <li>d) Interviews with individuals responsible for SER</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

*B.M.4.3 Has established an adequate and effective Health & Safety corrective action process to rectify and close Non-conformances*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective corrective action process is in place which contains the following: <ul style="list-style-type: none"> <li>a) Corrective action reports/plans and tracking tables</li> <li>b) additional actions are taken when a corrective action is off track</li> <li>c) A demonstrated link between the CAP and the performance management objectives and targets.</li> <li>d) Closure of action items is confirmed by a management representative after verification by the appropriate person</li> <li>e) Any issues/concerns noted in the insurance inspection report regarding people, fire or facility have an agreed corrective action plan.</li> <li>f) If <u>any</u> non-conformance is detected, investigation or evaluation, a recorded corrective action is implemented and progress against the corrective action measured, additional actions are taken if the Corrective Action Plan (CAP) is off-track</li> </ul> 2) Appropriate preventive action as a result of medical surveillance or injury: <ul style="list-style-type: none"> <li>a) Worker shall be removed from the current job immediately and offered another position in the facility.</li> <li>b) Auditee is prohibited from terminating the labor contract with the worker due to the medical surveillance results.</li> <li>c) Auditee shall provide medical treatment to the worker.</li> <li>d) Auditee shall provide re-examination to the worker.</li> <li>e) Auditee shall cover the medical treatment, re-examination, and rehabilitation cost for the worker.</li> </ul> 3) Records <ul style="list-style-type: none"> <li>a) Records recording the non-conformance</li> <li>b) Corrective action plan for each non-conformance</li> <li>c) Progress reports on the Corrective Action Plan</li> <li>d) Closure verification reports (with mgmt. confirmation)</li> <li>e) Copies of any regulatory citations/violation notices received in the past three years, including any communications with the agencies are available for review.</li> </ul>	Applicable	Not Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		



## C. ENVIRONMENT

### C1) Environmental Permits and Reporting

*C1.1 All required permits, licenses and test reports for environment are in place and communicated timely to government (if required)*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Permits, licenses related to special equipment (such as boiler, etc.) or test results are posted when required 2) Required postings are current and located in public view.	1) All required Environment permits, licenses and test reports are in place and valid. <ul style="list-style-type: none"> <li>a) Operating permit</li> <li>b) Air emissions</li> <li>c) Wastewater discharge</li> <li>d) Storm water exposure</li> <li>e) Hazardous materials storage and use</li> <li>f) Generation of waste (solid and hazardous)</li> </ul> 2) All government reporting is on time and accurate 3) Professional certificates 4) Environment ERT members have the required qualifications/certifications	Applicable	Only interview workers if posting or signage of relevant permits, licenses or test reports is required to be posted.
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Check if any unidentified impacts to: <ul style="list-style-type: none"> <li>a) Air emissions</li> <li>b) Wastewater discharge</li> <li>c) Storm water exposure</li> <li>d) Hazardous materials storage and use</li> <li>e) Generation of waste (solid and hazardous)</li> </ul>			
Additional specific rating:			
Priority	Major	Minor	Not Applicable
3. Reportable environmental accidents or incidents are not reported to the governing agency as required by law 4. Mandatory government reporting is late for more than 3 months	See finding severity definition	See finding severity definition	No permits, license required, test reports or reporting required.
Remote Verification Acceptable:	YES		

## C2) Hazardous Substances

### *C2.1 Hazardous waste is responsibly disposed of using government-approved and/or licensed vendors*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Assessments, visit minutes or audit reports, with possible areas for improvement are maintained for each non-government transport and disposal vendor 2) Hazardous waste inventory records are maintained and accurate. 3) Inspection records of hazardous waste and their points of storage are maintained and accurate. 4) Copies of hazardous waste shipping papers are maintained and accurate 5) All non-government transport and disposal vendors have approved, current certificates and/or are licensed by the local regulatory authorities	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Hazardous waste is disposed of using a non-licensed transport or disposal vendor	See finding severity definition	See finding severity definition	No hazardous chemical waste generated
Remote Verification Acceptable:	YES		

### C3) Solid Waste

#### C3.1 Solid waste is managed and responsibly disposed of

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Engineering controls are used where appropriate 2) Waste is adequately and effectively i) Categorized ii) Handled iii) Stored iv) Moved <u>within</u> a single facility/ multiple facility. v) Access is controlled 3) Potential employee exposure methods are adequate and effective such as i) Segregation ii) Secondary containment iii) Ventilation iv) Fire protection	1) Process and administrative controls are in place and effective 2) Accurate waste inventory records are maintained and accurate. 3) Inspection records of waste and their points of storage are maintained and accurate. 4) Copies of waste manifests and shipping papers are maintained and accurate. 5) All transport and disposal vendors have approved, current certificates and/or licensed by the local regulatory authorities	Applicable	Interview workers who work with waste or are responsible for waste storage
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

## C4) Air Emissions

*C4.1 Air emissions are routinely monitored, and air emission control systems are routinely monitored for performance.*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Engineering controls are used where appropriate 2) Air emission treatment equipment is well maintained, appropriate and identified 3) Air emissions are treated prior to discharge in accordance with permit requirement 4) Ozone depleting substances are clearly labeled	1) Process and administrative controls are in place and effective 2) A routine preventive maintenance program for air emission treatment equipment 3) Air emission treatment equipment efficiency monitoring program 4) A program to evaluate the integrity of existing process air emission systems 5) Inspection records of air emission treatment equipment and their points of discharge are maintained and accurate. 6) List of air emissions and Ozone Depleting Substances is up to date and accurate	Applicable	Interview workers responsible for operating and maintaining air emission treatment systems
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) A program to evaluate the integrity of existing process air emission treatment systems: <ul style="list-style-type: none"> <li>a) Regularly test of the air emission system</li> <li>b) Correct any identified deficiencies immediately</li> </ul> 2) 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		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	No air emissions AND no Ozone Depleting Substances
Remote Verification Acceptable:	YES		

*C4.2 Environmental noise levels are within regulatory limits*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Engineering controls are used where appropriate 2) No excessive boundary noise 3) Boundary noise control devices are well maintained, appropriate and identified	1) Process and administrative controls are in place and effective 2) A routine preventive maintenance program boundary noise control devices 3) Boundary noise control devices efficiency monitoring program 4) Inspection records of boundary noise control devices are maintained and accurate.	Applicable	Interview workers responsible for operating and maintaining environmental noise control systems
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Boundary noise levels are evaluated per the permit conditions, upon changes to zoning or land use permits about the facility, or if there are any community noise complaints and boundary noise-level criteria are set accordingly.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Site does not have requirements on environmental noise
Remote Verification Acceptable:	YES		

## C5) Water Management

### *C5.1 Adequate and effective process are in place to record, characterize, and monitor water sources, water discharge and control channels of contamination*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Engineering controls are used where appropriate 2) The source of water (entry point of water to the site) is clear 3) Water withdrawal and discharge points don't appear to heavily impact local waterbodies (e.g., strongly colored discharge, acrid smell, floating debris, etc.). 4) Equipment such as tanks, piping, and storage vessels are compatible with the waste materials being stored and transported. 5) Industrial and/or sanitary wastewater is treated in accordance with permit requirements. 6) Wastewater treatment system is installed, in operation, well maintained and appears to be operating effectively based on visual inspection. 7) Water channels appear free of contamination 8) Water channels are protected from contamination 9) Appropriate emergency response equipment / materials are in place to respond to a possible water channel contamination	1) Process and administrative controls are in place and effective 2) Water and wastewater inventory records are maintained and accurate. 3) Inspection records of wastewater and their points of storage and discharge are maintained and accurate. 4) Copies of wastewater manifests and shipping papers are maintained and accurate. 5) All transport and disposal vendors have approved, current certificates and/or licensed by the local regulatory authorities 6) A routine preventive maintenance program for wastewater treatment systems 7) Wastewater treatment system efficiency monitoring program 8) A program to evaluate the integrity of existing process wastewater collection systems 9) Potential contamination sources to water channels are identified 10) Identified water channel contamination sources 11) Description of spills/water channel contamination	Applicable	Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Water withdrawal <ul style="list-style-type: none"> <li>a) Source of water = on-site (e.g., surface withdrawal, aquifer via well) or off-site via municipal or private company service</li> <li>b) Good practice is to understand where the municipal or private company service withdraws its water</li> </ul> 2) A program to evaluate the integrity of existing process wastewater collection systems: <ul style="list-style-type: none"> <li>a) Regularly test of the process wastewater system</li> <li>b) Correct any identified deficiencies immediately</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

## C6) Energy Consumption and Greenhouse Gas Emissions

### C6.1 Energy consumption and all relevant scopes 1 and 2 Greenhouse gas (GHG) emissions are tracked and recorded

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Engineering controls are used where appropriate 2) There is no significant energy consumption or GHG emissions at the facility that are not tracked and recorded	1) Process and administrative controls are in place and effective 2) The sources of electricity and other energy are documented, consumption recorded and accurate by source <ul style="list-style-type: none"> <li>a) On-site combustion: oil, coal, diesel, natural gas, propane, garbage, etc.</li> <li>b) Copies of records of total quantity of fuel combusted on-site (or easily extrapolated from fuel bills and other purchased fuel records)</li> <li>c) Purchased electricity</li> <li>d) Renewable energy use –If facility purchases renewable energy through their utility company</li> </ul> 3) Scope 1 and 2 Greenhouse Gas emissions are documented, consumption recorded and accurate by source and with a description of its boundary	Applicable	Not Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
1) GHG engineering control examples <ul style="list-style-type: none"> <li>a) Building automation technology, programmable thermostats, lighting controls, or energy-efficient heating, cooling, lighting, and ventilation technology</li> <li>b) Use of on-site combustion or vehicles that are fuel efficient or use a less GHG-intensive source (natural gas, ethanol, etc.)</li> <li>c) Purchasing or installing on-site renewable energy</li> <li>d) Use of high-efficient collection/treatment systems to absorb/treat cleaning agents</li> </ul> 1) Use of refrigerants with low global warming potential (GWP) in Heating, Ventilation, and Air Conditioning (HVAC) systems	1) GHG = greenhouse gases such as carbon dioxide, methane, water vapor, and nitrous oxide but also include the chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs), as well as sulfur hexafluoride (SF <sub>6</sub> ) 2) Scope 1 GHG emissions are all direct GHG emissions 3) 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)		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES, unless significant energy consumption or GHG emissions that are not recorded are discovered.		



# C.M Environment Management Systems

## C.M.1 Risk Assessment (and Risk Management)

*C.M.1.1 An adequate and effective environment compliance process to monitor, identify, understand and ensure compliance with applicable laws and regulations and customer requirements is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Process a) Adequate and effective <u>quarterly</u> compliance process to maintain a current understanding of applicable legal and customer requirements: i) Identify ii) Track iii) Assess iv) Integrate v) Implement vi) Records 2) Records 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 d) Review of the key customer requirements that impact the operations as these related to the RBA code	Applicable	Not Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*C.M.1.2 An adequate and effective management process to identify and assess environmental risks*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not applicable	1) Adequate and effective environment 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). <ul style="list-style-type: none"> <li>a) Risk assessment minimum elements:                             <ul style="list-style-type: none"> <li>i) Every environmental medium</li> <li>ii) Greenhouse Gas impact</li> <li>iii) Ozone depleting substances (ODS) impact</li> </ul> </li> </ul> 2) Scope of risk assessment: <ul style="list-style-type: none"> <li>a) Every environmental medium</li> <li>b) Every site operation/process</li> <li>c) Every Physical location</li> <li>d) Every Chemical or material used</li> </ul> 3) The risk assessment is current and updated when there is a Significant Change                     4) Risk are addressed through the Hierarchy of Controls <ul style="list-style-type: none"> <li>a) Proper design (elimination and/or substitution)</li> <li>b) Engineering controls</li> <li>c) Process and Administrative controls</li> </ul> 5) Risk assessment must include exposure to multiple chemicals                     6) Each identified risk has an action to minimize such risk through the Hierarchy of controls <u>and</u> improvement objective in a documented gated process, demonstrating that each hierarchy level has been fully evaluated and reasons why it could not address the risk fully before proceeding to the next hierarchal level	Applicable	Not Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

## C.M.2 Environment Control processes

*C.M.2.1 Environment 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*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Senior representative <ul style="list-style-type: none"> <li>a) A senior representative is assigned responsibility for implementing programs               <ul style="list-style-type: none"> <li>i) To ensure compliance with laws and regulations and the requirements of the RBA</li> <li>ii) Is authorized to implement programs, process and corrective actions as needed for regulatory compliance and RBA conformance</li> </ul> </li> </ul> 2) Assignment <ul style="list-style-type: none"> <li>a) Responsibilities and authority of each organizational level are recorded in position plans, job descriptions and/or the facility's management system documentation               <ul style="list-style-type: none"> <li>i) For normal situations</li> <li>ii) For emergency situations</li> </ul> </li> </ul> 3) A specific individual or individuals within the facility organization who is responsible for all aspects <ul style="list-style-type: none"> <li>a) Hazardous materials</li> <li>b) Waste</li> <li>c) Air emission treatment</li> <li>d) Environmental noise</li> <li>e) Wastewater</li> <li>f) Energy and GHG</li> <li>g) Ozone depleting substances (elimination) if applicable</li> </ul>	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*C.M.2.2 Adequate and effective environment policies and control processes are established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) <u>Policies:</u> Adequate policies are in place for: <ul style="list-style-type: none"> <li>a) Reduction (and elimination)                             <ul style="list-style-type: none"> <li>i) Ozone depleting substance (ODS)</li> <li>ii) Energy and GHG</li> <li>iii) Use of natural resources</li> <li>iv) Raw materials and resulting waste</li> </ul> </li> </ul> 2) Adequate and effective waste management process is in place for: <ul style="list-style-type: none"> <li>a) Reception</li> <li>b) Storage</li> <li>c) Dispensing</li> <li>d) Use</li> <li>e) Disposal</li> </ul> 3) Adequate and effective recorded program to control the identified potential hazards is place and follows the hierarchy of controls in a documented gated process, demonstrating that each hierarchy level has been fully evaluated and reasons why it could not address the risk fully before proceeding to the next hierarchy level                     4) A preventive maintenance process for all treatment equipment for each environmental medium.                     5) Investigation of each environmental incident (e.g., spill, etc.) resulting in a preventive and corrective action plan.                     6) Adequate and effective emergency response process with clearly defined steps and roles/responsibilities                     7) Hazardous/ozone depleting substances <ul style="list-style-type: none"> <li>a) Adequate and effective process are in place for the safe return and disposal of                             <ul style="list-style-type: none"> <li>i) Hazardous substances</li> <li>ii) Ozone depleting substances</li> </ul> </li> </ul>	Applicable	
<b>Additional specific rating:</b>			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*C.M.2.3 An adequate and effective environment training process is established for all managers/workers on all policy/process/job related aspects and performance targets*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Process a) adequate and effective training to workers/managers: 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 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) 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 hazardous chemical and waste receive specialized training. 2) Records a) Training records include a verification of training effectiveness b) Educational materials	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

## C.M.3 Communications

*C.M.3.1 An adequate and effective worker/manager (including to solicit and encourage worker participation, input and feedback for improvement), Supplier and customer communication/reporting process for environment is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Feedback channels are clearly communicated and visible (suggestion box, etc.) 2) Environmental communication clearly posted in the facility or placed in a location identifiable and accessible by workers 3) Hazard signage and information (labels and safety data sheet (SDS formally MSDS) or characterization in the case of hazardous waste)	1) Adequate and effective worker/manager, Supplier and customer communication/reporting process to Suppliers is in place <ul style="list-style-type: none"> <li>a) Suppliers               <ul style="list-style-type: none"> <li>i) Correspondence to Supplier management</li> <li>ii) Contract terms and conditions requiring Suppliers to conform to the RBA code</li> </ul> </li> <li>b) Customers               <ul style="list-style-type: none"> <li>i) Environment practices and performance</li> <li>ii) <u>Submitting SAQ to customers does not qualify as disclosure/communication to customers</u></li> </ul> </li> <li>c) Workers / Managers               <ul style="list-style-type: none"> <li>i) Adequate and effective process to obtain worker input and feedback</li> <li>ii) The minimum communication topics (each policy, process and mgmt. systems element such as responsibilities, risk, grievance...) are covered                   <ul style="list-style-type: none"> <li>(1) Hazard communication process: all hazards present at the site and action promoting of a safe workplace.</li> </ul> </li> </ul> </li> <li>d) Public               <ul style="list-style-type: none"> <li>i) Publicly report a corporate-wide* GHG footprint (total scopes 1 &amp; 2) as a quantitative value of total emissions. A percentage (e.g., 90% of last year's emissions) is unacceptable.</li> <li>ii) Value must represent annual emissions.</li> </ul> </li> </ul> 2) Records <ul style="list-style-type: none"> <li>a) Communications records include a verification of communication effectiveness *</li> <li>b) Input/feedback records</li> <li>c) Written information to workers on how to provide input/feedback for improvement</li> <li>d) Communications/presentations to Suppliers</li> <li>e) Communications/ presentations to customers if requested</li> </ul>	Applicable	Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) <u>Corporate wide* = reflecting at least a significant majority (e.g., 90-95%) of corporate owned operations</u> 2) GHG a) Description of boundary defined for reporting (such as: financial control, operational control, or equity share) b) Description of how energy consumption and other GHG sources are converted into GHG emissions using an internationally accepted GHG protocol 3) Examples of worker participation mechanisms: a) Worker surveys b) Suggestions boxes c) Worker focus groups d) Joint worker-management committees e) Worker/union representatives f) Process improvement teams. 4) Worker in this context refers to auditee's workers and workers deployed by the third-party service provider, vocational schools and labor agents and contractors.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*C.M.3.2 An adequate and effective grievance process where work-related and Code-related grievances without fear of reprisal or intimidation is established can be confidentially communicated*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Grievance 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 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 c) Adequate and effective program to receive, review and respond to environmental concerns reported. (e.g., incentive systems, etc.). 2) Investigation and actions a) Auditee shall promptly investigate the validity of the any grievance 3) Records: a) Grievance records b) Investigation records c) Workers are provided with written information on how to report grievances d) Environmental concern logs, evaluation records and action plans	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	Auditor guidance: evidence to show actions have been taken for the grievances in the past 12 months" may need to spot check 1 or 2 case records.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1. Confirmed grievance without corrective action plan 2. Grievance has not been investigated/addressed within 3 months after being received	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		



## C.M.4 Performance Review and Continuous Improvement

### *C.M.4.1 An adequate and effective environment management performance review and continuous improvement process is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>1) Process               <ol style="list-style-type: none"> <li>a) Adequate and effective annual process by senior management:                   <ol style="list-style-type: none"> <li>i) Management system review</li> <li>ii) Performance review</li> </ol> </li> <li>b) Formal and communicated indicators, objectives and targets</li> <li>c) Additional action plans if indicator, objective or target is off track</li> </ol> </li> <li>2) 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:               <ol style="list-style-type: none"> <li>a) Materiality assessment: identify significant environmental aspects and establish programs for monitoring and control of these aspects.</li> <li>b) 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. They will always include                   <ol style="list-style-type: none"> <li>i) Time Period: (between base date and target date) must be forward looking</li> <li>ii) Base date: Date from which the goal is being measured</li> <li>iii) Target date: Date in the future when which the goal is intended to be achieved</li> <li>iv) Baseline: the value of what is being measured at the start</li> <li>v) Targeted improvement value: The quantitative value of the goal (numeric and greater than 0)</li> <li>vi) Reduce resource consumption and will always include                       <ol style="list-style-type: none"> <li>(1) Greenhouse Gas impact</li> <li>(2) Ozone depleting substances (ODS) impact</li> </ol> </li> <li>vii) Reduction programs must be structured with roles and responsibilities</li> <li>viii) Reduction programs should not harm workers or entail excessive cost.</li> </ol> </li> </ol> </li> <li>3) Scope 1 and Scope 2 GHG corporate wide reduction target               <ol style="list-style-type: none"> <li>a) <u>Timeline</u>: Goals must clearly define the period considered                   <ol style="list-style-type: none"> <li>i) Base date: Date from which the goal is being measured</li> <li>ii) Target date: Date in the future when which the goal is intended to be achieved</li> <li>iii) Baseline: the value of what is being measured at the start</li> <li>iv) Targeted improvement value: The quantitative value of the goal (numeric and greater than 0)</li> </ol> </li> </ol> </li> <li>4) Evaluation               <ol style="list-style-type: none"> <li>a) On a regular basis not exceeding 2 years but earlier if there is a Significant Change                   <ol style="list-style-type: none"> <li>i) Effectiveness of controls (including control processes)</li> <li>ii) Every program</li> </ol> </li> </ol> </li> </ol>	Applicable	Not Applicable

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	5) Records <ul style="list-style-type: none"> <li>a) System review meetings</li> <li>b) Management review meeting presentation materials/analysis/data</li> <li>c) Formal target, indicator and objective tracking</li> <li>d) Regular progress reporting</li> <li>e) Preventive and corrective action plan following the review</li> <li>f) Materiality assessment (updated when changes in machinery, process or materials used or facility)</li> <li>g) Data for each material emission and discharge of pollutants, waste and natural resource</li> </ul>	Applicable	Not Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Management review minutes include e.g. <ul style="list-style-type: none"> <li>a) Agenda</li> <li>b) Presentation material (references)</li> <li>c) Date</li> <li>d) Attendees (including senior manager)?</li> <li>e) Progress towards objectives</li> <li>f) Results of audits</li> <li>g) Completion of corrective/preventive actions</li> <li>h) Risks/issues</li> <li>i) Other information needed to determine the effectiveness of the management system and identify improvement opportunities</li> <li>j) Agreed preventive/corrective actions</li> </ul> 2) The process should also include <ul style="list-style-type: none"> <li>a) Assignment of owners</li> <li>b) Implementation plans</li> <li>c) Completion dates</li> <li>d) Communication of objectives to workers (as appropriate).</li> <li>e) How frequently progress in meeting objectives is reviewed</li> <li>f) Objectives and targets are clearly designed to achieve continual improvement</li> </ul> 3) The process should also include <ul style="list-style-type: none"> <li>a) Assignment of owners</li> <li>b) Implementation plans</li> <li>c) Completion dates</li> <li>d) Communication of objectives to workers (as appropriate).</li> <li>e) How frequently progress in meeting objectives is reviewed</li> <li>f) Objectives and targets are clearly designed to achieve continual improvement</li> </ul>		

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	4) Natural resources = e.g., Water fossil fuels, minerals and virgin forest products 5) 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. 6) GHG: Process to effectively manage energy if the facility is large or complex enough to warrant these process 7) Scope 1 and Scope 2 GHG corporate wide reduction target 8) <u>Type of Goal (Methodology)</u> : Goals must reflect one of the following methodologies as defined by the GHG Protocol 9) Intensity- Greenhouse gas intensity goals are policies that specify emissions reductions relative to productivity or economic output, for instance, tons CO2/Revenue. a) Absolute: By contrast, absolute emissions goals specify reductions measured in metric tons, relative only to a historical baseline. For example: tons of CO2e over x years.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*C.M.4.2 An adequate and effective environment self-audit process to periodically assess conformance with the RBA Code and customer requirements*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective <u>self</u> -audit process to periodically assess conformance with: <ul style="list-style-type: none"> <li>a) Applicable regulatory requirements</li> <li>b) RBA Code requirements</li> <li>c) Own policies, standards and management system</li> <li>d) Other requirements to which the facility subscribes</li> </ul> 2) Audit findings are reviewed by senior management.                     3) Records <ul style="list-style-type: none"> <li>a) Self-audit reports</li> </ul>	Applicable	Not Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Audit scope: <ul style="list-style-type: none"> <li>a) All areas of the facility,</li> <li>b) All processes, physical conditions and work practices</li> <li>c) Review of records and records</li> <li>d) Interviews with individuals responsible for SER.</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*C.M.4.3 Has established an adequate and effective environment corrective action process to rectify and close Non-conformances*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective corrective action process is in place which contains the following: <ul style="list-style-type: none"> <li>a) Corrective action reports/plans and tracking tables</li> <li>b) Additional actions are taken when a corrective action is off track</li> <li>c) A demonstrated link between the CAP and the performance management objectives and targets.</li> <li>d) Closure of action items is confirmed by a management representative after verification by the appropriate person</li> <li>e) Preventive/corrective actions plan past spills, contamination and environmental incidents.</li> <li>f) If <u>any</u> non-conformance is detected, investigation or evaluation, a recorded corrective action is implemented and progress against the corrective action measured, additional actions are taken if the Corrective Action Plan (CAP) is off-track</li> </ul> 2) Records <ul style="list-style-type: none"> <li>a) Records recording the non-conformance</li> <li>b) Corrective action plan for each non-conformance</li> <li>c) Progress reports on the Corrective Action Plan</li> <li>d) Closure verification reports (with mgmt. confirmation)</li> <li>e) Copies of any regulatory citations/violation notices received in the past three years, including any communications with the agencies are available for review.</li> </ul>	Applicable	Not Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1. Scope of corrective action plan: <ul style="list-style-type: none"> <li>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</li> </ul> 2. Corrective action reports/plans and tracking tables <ul style="list-style-type: none"> <li>a. Root cause analysis of the finding to ensure the system gap is addressed</li> <li>b. Specific corrective actions</li> <li>c. Owners of the action</li> <li>d. Due dates are established to address all audit issues.</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

## D. ETHICS

### D1) No Improper Advantage

*D1.1 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	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>1. Public information does not reveal any current cases or allegations on bribery, improper advantage, corruption, extortion, or embezzlement</li> <li>2. Grievance records do not reveal any current cases or allegations on bribery, improper advantage, corruption, extortion, or embezzlement</li> <li>3. Declarations of conflict of interest are recorded                             <ol style="list-style-type: none"> <li>a. Direct workers</li> <li>b. Indirect workers</li> </ol> </li> <li>4. Personnel files, leave records, disciplinary records, grievance records confirm no negative consequence for any worker/employee refusing to do anything in Non-conformance with the "highest standard of integrity" policy</li> </ol>	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
			Indirect workers should know both the Auditee's and labor agent's process on bribes or other means of obtaining undue or improper advantage.
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Confirmed case of bribery, improper advantage, corruption, extortion, or embezzlement without a corrective action plan.	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

## D2) Disclosure of Information

### *D2.1 No evidence of misreporting, record falsification, misrepresentation, or evidence of communicating inaccurate information to the public*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
If publicly communicated, company information is posted then it is accurate	1) Financial and annual reports about the Auditee's business operations are available 2) Information regarding participant labor, health & safety, environmental practices, business activities, structure, financial situation and performance communicated to Suppliers and customer is accurate. 3) Falsification of records or misrepresentation of conditions or practices is unacceptable 4) All publicly communicated company information (job posting, product details, company/facility promotion (booklet/flyer), commercial advertising, press releases, website, etc.) are accurate	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Unintentional errors are out of scope for this question. 2) Auditors will cross check several different business records to ensure records align and are accurate.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Records are deliberately misleading	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

### D3) Intellectual Property

*D3.1 No 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	Management Interview	Worker Interview
IP and business information visibly protected	1) Adequate and effective process and administrative control IT measures for access to <ul style="list-style-type: none"> <li>a) IT systems</li> <li>b) IP</li> </ul> 2) Protection agreements (NDA, confidentiality...) are in place for <ul style="list-style-type: none"> <li>a) Employees</li> <li>b) Workers</li> <li>c) Suppliers</li> <li>d) Customers</li> </ul>	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Information from suppliers and customers could include: <ul style="list-style-type: none"> <li>a) Names and contact information for key customer personnel</li> <li>b) Contract pricing and volumes</li> <li>c) Names of sub-contractors and materials/components suppliers, etc.</li> <li>d) Their identities and trademarks</li> <li>e) Third-Party Intellectual Property (IP)</li> <li>f) Patent records</li> <li>g) Copyright-protected content.</li> </ul> 2) Customers could include channel partner and other business relationships 3) Suppliers could include representatives, agents, sub-contractors and other business relationships		Interview only relevant personnel, those who handle supplier or customer information and IP
Additional specific rating:			
Priority	Major	Minor	Not Applicable
IP is not protected	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		



## D4) Fair Business, Advertising and Competition

*D4.1 No identified risk or evidence of non-conformance with fair business, advertising and competition standards*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1. Grievance records (internal and external) do not reveal any allegations on fair business, fair advertising or fair competition. a) If grievance do reveal any allegations on fair business, fair advertising or fair competition then this is investigated, and action taken if the allegation is found to be substantiated.	Applicable	staff who influence purchase decisions
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

## D5) Protection of Identity and Non-Retaliation

### *D5.1 No evidence of retaliation or reduced protection of identity*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>Grievance and investigation record confirm no forms of retaliation</li> <li>Grievance communication records do not breach protection of identity</li> <li>Personnel records (including redundancy records) demonstrate no retaliation</li> </ol>	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
<ol style="list-style-type: none"> <li>Confirmed retaliation</li> <li>Confirmed breach of identity</li> </ol>	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

## D6) Privacy

### D6.1 No evidence of unauthorized disclosure of personal information

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Personal information is visibly protected	<ol style="list-style-type: none"> <li>1. No information is viewable to someone unauthorized</li> <li>2. Information is only collected, stored, processed, transmitted, or shared specifically with the individual approval (or defaulted by local law)</li> </ol>	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	<ol style="list-style-type: none"> <li>1) <u>Scope:</u> <ol style="list-style-type: none"> <li>a) Everyone Auditee does business with, including suppliers, customers, consumers and employees.</li> <li>b) Requirements apply when personal information is                             <ol style="list-style-type: none"> <li>i) Collected</li> <li>ii) Stored</li> <li>iii) Processed</li> <li>iv) Transmitted</li> <li>v) Shared.</li> </ol> </li> </ol> </li> </ol>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Personal information is collected, stored, processed, transmitted or shared without the individual's approval	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

# D.M Ethics Management Systems

## D.M.1 Risk Assessment (and Risk Management)

*D.M.1.1 An adequate and effective ethics compliance process to monitor, identify, understand and ensure compliance with applicable laws and regulations and customer requirements is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Process a) Adequate and effective <u>quarterly</u> compliance process to maintain a current understanding of applicable legal and customer requirements: i) Identify ii) Track iii) Assess iv) Integrate v) Implement vi) Records b) A documented process is in place to ensure permits are renewed before current permits, licenses and testing expire 2) Records 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 d) Review of the key customer requirements that impact the operations as these related to the RBA code	Applicable	Not Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*D.M.1.2 An adequate and effective management process to identify and assess ethics risks*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not applicable	<ol style="list-style-type: none"> <li>1) Adequate and effective risk assessment process is in place to identify the most significant risks (including applicable legal requirements and applicable customer requirements).</li> <li>2) Risk assessment considers business circumstances (country/region of operations, stakeholders, etc.) 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, etc.</li> <li>3) Risk assessment minimum elements:               <ol style="list-style-type: none"> <li>a) Upholding the highest standards of integrity in all business interactions</li> <li>b) Obtaining undue or improper advantage being promised, offered, authorized, given or accepted</li> <li>c) Intellectual Property protection</li> <li>d) Fair business, advertising and competition</li> <li>e) Non-retaliation or protection of identity</li> <li>f) Unauthorized disclosure of personal information</li> </ol> </li> <li>4) Scope of risk assessment:               <ol style="list-style-type: none"> <li>a) Every task</li> <li>b) Every site operation/process</li> <li>c) Every physical location</li> <li>d) Young workers are a separate category</li> <li>e) Foreign and internal migrant workers are a separate category</li> </ol> </li> <li>5) The risk assessment is current and updated when there is a Significant Change</li> </ol>	Applicable	Not Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		

## D.M.2 Ethics Control processes

*D.M.2.1 Ethics 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*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Senior representative <ul style="list-style-type: none"> <li>a) A senior representative is assigned responsibility for implementing programs               <ul style="list-style-type: none"> <li>i) To ensure compliance with laws and regulations and the requirements of the RBA</li> <li>ii) Is authorized to implement programs, process and corrective actions as needed for regulatory compliance and RBA conformance</li> </ul> </li> </ul> 2) Assignment <ul style="list-style-type: none"> <li>a) Responsibilities and authority of each organizational level are recorded in position plans, job descriptions and/or the facility's management system documentation               <ul style="list-style-type: none"> <li>i) For normal situations</li> <li>ii) For emergency situations</li> </ul> </li> </ul>	Applicable	Applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*D.M.2.2 Adequate and effective ethics policies and control processes are established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) <u>Policies:</u> Adequate policies are in place for: <ul style="list-style-type: none"> <li>a) 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</li> <li>b) Gifts to or from suppliers and customers is not excessive in cost and frequency.</li> <li>c) Bribes or other methods of obtaining undue or improper advantage are not being promised, offered, authorized, given or accepted.</li> <li>d) No conflicts of interest</li> <li>e) Ensure compliance with anti-corruption laws</li> <li>f) Appropriate sanctions when a violation is confirmed/proven and preventive action plan</li> <li>g) Ensure that all business dealings should be transparently performed and accurately reflected on Participant's business books and records</li> <li>h) No misrepresentation by workers, managers and their agents.</li> <li>i) Information received from suppliers, customers as part of the contracting process is protected.</li> <li>j) IP ownership and IP are protected</li> <li>k) Ensuring fair business, advertising and competition standards are upheld</li> <li>l) No collusion with other companies on product pricing or other factors that could reduce competition</li> <li>m) Protection of identity and non-retaliation</li> <li>n) Protection of whistleblowers and/or users the of the grievance mechanism(s) (internal and external)</li> <li>o) Prevent unauthorized disclosure of personal information</li> </ul> 2) If labor agents are used, then this process also need to be implemented at the labor agent level. 3) Process <ul style="list-style-type: none"> <li>a) Formal program to ensure public Auditee statements are not false or misleading</li> <li>b) Adequate and effective process for every policy element</li> <li>c) IT measures and guidelines about the distribution/dissemination of information to protect information from suppliers and customers and IP</li> </ul> 4) Investigation and sanctions <ul style="list-style-type: none"> <li>a) Appropriate investigation process when there is an alleged violation including misrepresentation by workers, managers and their agents.</li> <li>b) Appropriate sanctions when a violation is confirmed/proven and preventive action plan</li> <li>c) Records                             <ul style="list-style-type: none"> <li>i) Investigation reports on alleged violations</li> <li>ii) Sanctions in personnel files for proven/confirmed violations and preventive action plan</li> </ul> </li> </ul>	Applicable	Applicable
<b>Additional specific rating:</b>			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	NO		

*D.M.2.3 An adequate and effective ethics training process is established for all managers/workers on all policy/process/job related aspects and performance targets*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Process <ul style="list-style-type: none"> <li>a) Adequate and effective training to workers/managers:                             <ul style="list-style-type: none"> <li>i) New employee orientation plan</li> <li>ii) Training needs analysis</li> <li>iii) Training plan</li> <li>iv) Training material</li> <li>v) Training records</li> <li>vi) Training frequency</li> <li>vii) Training efficiency verification</li> </ul> </li> <li>b) Minimum training topics are covered                             <ul style="list-style-type: none"> <li>i) Upholding the highest standards of integrity in all business interactions</li> <li>ii) Obtaining undue or improper advantage being promised, offered, authorized, given or accepted</li> <li>iii) Intellectual Property Protection</li> <li>iv) Fair Business, Advertising and Competition</li> <li>v) Non-retaliation or protection of identity</li> <li>vi) Unauthorized disclosure of personal information</li> </ul> </li> </ul> 2) Records <ul style="list-style-type: none"> <li>a) Training records include a verification of training effectiveness</li> <li>b) Educational materials</li> </ul>	Applicable	Applicable
<b>Additional specific rating:</b>			
Priority	Major	Minor	Not Applicable
See finding severity definition	>5% of workers not trained within 30 days of the hire date	See finding severity definition	Not Applicable
Remote Verification Acceptable:	YES		



## D.M.3 Communications

*D.M.3.1 An adequate and effective worker/manager (including to solicit and encourage worker participation, input and feedback for improvement), Supplier and customer communication/reporting process for ethics is established*

Conformance Requirements:			
Site Observations	Record Review	Management	Worker
Feedback channels are clearly communicated and visible (suggestion box, etc.)	<ol style="list-style-type: none"> <li>1) Adequate and effective worker/manager, Supplier and customer communication/reporting process to Suppliers is in place               <ol style="list-style-type: none"> <li>a) Suppliers                   <ol style="list-style-type: none"> <li>i) Correspondence to Supplier management</li> <li>ii) Contract terms and conditions requiring Suppliers to conform to the RBA code</li> </ol> </li> <li>b) Customers                   <ol style="list-style-type: none"> <li>i) Ethics practices and performance</li> <li>ii) <u>Submitting SAQ to customers does not qualify as disclosure/communication to customers</u></li> </ol> </li> <li>c) Workers / Managers                   <ol style="list-style-type: none"> <li>i) Adequate and effective process to obtain worker input and feedback</li> <li>ii) The minimum communication topics (each policy, process and mgmt. systems element such as responsibilities, risk, grievance, etc.) are covered</li> </ol> </li> </ol> </li> <li>2) Records               <ol style="list-style-type: none"> <li>a) Communications records include a verification of communication effectiveness</li> <li>b) Input/feedback records</li> <li>c) Written information to workers on how to provide input/feedback for improvement</li> <li>d) Communications/presentations to Suppliers</li> <li>e) Communications/ presentations to customers</li> </ol> </li> </ol>	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management	Worker
	<ol style="list-style-type: none"> <li>1) Examples of worker participation mechanisms:               <ol style="list-style-type: none"> <li>a) Worker surveys</li> <li>b) Suggestions boxes</li> <li>c) Worker focus groups</li> <li>d) Joint worker-management committees</li> <li>e) Worker/union representatives</li> <li>f) Process improvement teams.</li> </ol> </li> <li>2) Worker in this context refers to auditee's workers and workers deployed by the third-party service provider, vocational schools and labor agents and contractors.</li> </ol>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*D.M.3.2 An adequate and effective confidential ethics grievance process without fear of reprisal or intimidation is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
1) Grievance 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 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 c) Ethics concern notification i) Adequate and effective program to receive, review and respond to safety concerns reported. (e.g., incentive systems, etc.). ii) Workers shall be encouraged to raise ethics concerns. 2) Investigation and actions a) Auditee shall promptly investigate the validity of the any grievance 3) Records: a) Grievance records b) Investigation records c) Workers are provided with written information on how to report grievances	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	Auditor guidance: evidence to show actions have been taken for the grievances in the past 12 months" may need to spot check 1 or 2 case records.		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1. Confirmed grievance without corrective action plan 2. Grievance has not been investigated/addressed within 3 months after being received	See finding severity definition	See finding severity definition	Not Applicable
Remote Verification Acceptable:	NO		

## D.M.4 Performance Review and Continuous Improvement

### *D.M.4.1 An adequate and effective ethics management performance review and continuous improvement process is established*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>1) Process               <ol style="list-style-type: none"> <li>a) Adequate and effective annual process by senior management:                   <ol style="list-style-type: none"> <li>i) Management system review</li> <li>ii) Performance review</li> </ol> </li> <li>b) Formal and communicated indicators, objectives and targets</li> <li>c) Additional action plans if indicator, objective or target is off track</li> <li>d) Timeline: Goals must clearly define the period considered; each goal must include:                   <ol style="list-style-type: none"> <li>i) Time Period: (between base date and target date) must be forward looking</li> <li>ii) Base date: Date from which the goal is being measured</li> <li>iii) Target date: Date in the future when which the goal is intended to be achieved</li> <li>iv) Baseline: the value of what is being measured at the start</li> <li>v) Targeted improvement value: The quantitative value of the goal (numeric and greater than 0)</li> </ol> </li> </ol> </li> <li>2) Evaluation               <ol style="list-style-type: none"> <li>a) On a regular basis not exceeding 2 years but earlier if there is a Significant Change                   <ol style="list-style-type: none"> <li>i) Effectiveness of controls (including control processes)</li> <li>ii) Every program</li> </ol> </li> </ol> </li> <li>3) Monitor on a regular basis for possible breaches on               <ol style="list-style-type: none"> <li>a) Upholding the highest standards of integrity in all business interactions</li> <li>b) Obtaining undue or improper advantage being promised, offered, authorized, given or accepted</li> <li>c) Intellectual Property protection</li> <li>d) Fair business, advertising and competition</li> <li>e) Non-retaliation or protection of identity</li> <li>f) Unauthorized disclosure of personal information</li> </ol> </li> <li>4) Records               <ol style="list-style-type: none"> <li>a) System review meetings</li> <li>b) Management review meeting presentation materials/analysis/data</li> <li>c) Formal target, indicator and objective tracking</li> <li>d) Regular progress reporting</li> <li>e) Preventive and corrective action plan following the review</li> <li>f) Evaluation reports</li> </ol> </li> </ol>	Applicable	Not Applicable

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Management review minutes include e.g. a) Agenda b) Presentation material (references) c) Date d) Attendees (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		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*D.M.4.2 An adequate and effective ethics self-audit process to periodically assess conformance with the RBA Code and customer requirements*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective self-audit process to periodically assess conformance with: <ul style="list-style-type: none"> <li>a) Applicable regulatory requirements</li> <li>b) RBA Code requirements</li> <li>c) Own policies, standards and management system</li> <li>d) Other requirements to which the facility subscribes</li> </ul> 2) Inspect/assess/audit records verifying they are not falsified but accurate.                     3) Audit findings are reviewed by senior management.                     4) Records <ul style="list-style-type: none"> <li>a) Self-audit reports</li> </ul>	Applicable	Not Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) Audit scope: <ul style="list-style-type: none"> <li>a) All areas of the facility,</li> <li>b) All processes, physical conditions and work practices</li> <li>c) Review of records and records</li> <li>d) Interviews with individuals responsible for SER.</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

*D.M.4.3 Has established an adequate and effective ethics corrective action process to rectify and close Non-conformances*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Adequate and effective corrective action process is in place which contains the following: <ul style="list-style-type: none"> <li>a) Corrective action reports/plans and tracking tables</li> <li>b) Additional actions are taken when a corrective action is off track</li> <li>c) A demonstrated link between the CAP and the performance management objectives and targets.</li> <li>d) Closure of action items is confirmed by a management representative after verification by the appropriate person</li> <li>e) Any issues/concerns noted in the insurance inspection report regarding people, fire or facility have an agreed corrective action plan.</li> <li>f) If <u>any</u> non-conformance is detected, investigation or evaluation, a recorded corrective action is implemented and progress against the corrective action measured, additional actions are taken if the Corrective Action Plan (CAP) is off-track</li> </ul> 2) Records <ul style="list-style-type: none"> <li>a) Records recording the non-conformance</li> <li>b) Corrective action plan for each non-conformance</li> <li>c) Progress reports on the Corrective Action Plan</li> <li>d) Closure verification reports (with mgmt. confirmation)</li> <li>e) Copies of any regulatory citations/violation notices received in the past three years, including any communications with the agencies are available for review.</li> </ul>	Applicable	Not Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1. Scope of corrective action plan: <ul style="list-style-type: none"> <li>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</li> </ul> 2. Corrective action reports/plans and tracking tables <ul style="list-style-type: none"> <li>a. Root cause analysis of the finding to ensure the system gap is addressed</li> <li>b. Specific corrective actions</li> <li>c. Owners of the action</li> <li>d. Due dates are established to address all audit issues.</li> </ul>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

## E. SUPPLY CHAIN MANAGEMENT

### E1) Company Commitment

*E1.1 Adequate and effective Code of Conduct that is endorsed by executive management covering all elements of the RBA code*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
A Code of Conduct in a language understood by each worker is visible to all workers	1) Code of Conduct covering all elements of the RBA 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) Code of Conduct is appropriate for the nature and scope of the facility's operations.	Applicable	Applicable
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	The executive endorsement of the code can be absent when policy/Code is publicly displayed (e.g., intra or internet site).		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	See finding severity definition	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		

## E2) Materials Restrictions

### *E2.1 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	Management Interview	Worker Interview
Not Applicable	1) Corporate level implementation <ul style="list-style-type: none"> <li>a) Documented corporate policy</li> <li>b) Documented corporate process</li> <li>c) Assigned responsibility</li> <li>d) Proof of implementation</li> </ul> 2) Facility level (in case no corporate level implementation) <ul style="list-style-type: none"> <li>a) A documented process to ensure materials, packaging and components and chemical composition of products are conform with customer and legal requirements               <ul style="list-style-type: none"> <li>i) Comparing customer requirements to own specifications</li> <li>ii) Ensuring materials, packaging and components procured are in conformance with customer requirements</li> <li>iii) Documented requirements for conformance with the Material Restrictions required to its material /parts Suppliers</li> <li>iv) Regular audits and assessments of the process are performed to verify conformance.</li> <li>v) Address discovery of non-compliant materials or components and corrective actions are tracked, implemented.                   <ul style="list-style-type: none"> <li>(1) Additional actions taken to ensure completion at due date if corrective actions are not on track.</li> </ul> </li> </ul> </li> <li>b) Analytical data from material/parts Suppliers is requested/required</li> <li>c) Statements and/or certificates of conformance and analytical data to its customers upon request are provided and accurate</li> <li>d) Chemical composition of products is available and accurate</li> <li>e) Specifications, statements and/or certificates of conformance from its Suppliers are available and accurate</li> <li>f) Monitoring &amp; reporting records are available and accurate</li> </ul>	Applicable	Not applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
No program is in place AND product has been subject to regulatory action	The responsibility could be shared corporate, and facility then complete the relevant section 1 and/or 2 <ul style="list-style-type: none"> <li>a. If implementation is done at corporate level, then verify 1), if not complete then "Major"</li> <li>b. if implementation at facility level, then verify 2)</li> <li>c. If implementation at both levels, then verify 1) and 2) then the highest of both rating apply</li> </ul>	See finding severity definition	Not applicable
Remote Verification Acceptable:	YES		



## E3 Responsible Sourcing of Minerals

*E3.1 Adequate and effective Conflict Minerals Supply Chain Policy and Management System 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	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>1) Policy               <ol style="list-style-type: none"> <li>a) Adequate and effective Conflict minerals 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:                   <ol style="list-style-type: none"> <li>i) Be communicated to suppliers and the public.</li> <li>ii) Cover all 3TG included in the company's products</li> <li>iii) Commit the company to exercise due diligence on the source and chain of custody of minerals in accordance with the OECD Due Diligence Guidance</li> </ol> </li> <li>2) Corporate level implementation                   <ol style="list-style-type: none"> <li>a) Documented corporate policy</li> <li>b) Documented corporate process</li> <li>c) Assigned responsibility</li> <li>d) Proof of implementation</li> </ol> </li> <li>3) Facility level (in case no corporate level implementation)                   <ol style="list-style-type: none"> <li>a) Management System requirements                       <ol style="list-style-type: none"> <li>i) The facility shall implement the Supply Chain Policy and Management System within its own operation(s), including:                           <ol style="list-style-type: none"> <li>(1) Identifying a senior management person responsible for implementation of the Management System</li> <li>(2) Including 3TG due diligence sourcing requirements in written agreements and/or contracts with suppliers.</li> <li>(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</li> <li>(4) Reviewing the Management System, on an annual basis, to ensure conformance and improve where process improvements have been identified.</li> </ol> </li> </ol> </li> <li>b) Records                       <ol style="list-style-type: none"> <li>i) Maintaining records related to 3TG due diligence for a minimum of two (2) years</li> <li>ii) Annual review and improvement plan (if applicable)</li> <li>iii) Mitigation plans with suppliers if any risk is identified</li> <li>iv) Additional actions taken to ensure completion by a specified date if mitigation actions are not on track.</li> </ol> </li> </ol> </li> </ol> </li> </ol>	Applicable	Applicable (procurement staff)

Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	1) 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. 2) 3TG= Tantalum, Tin, Tungsten and Gold 3) <u>For rating, recordation means supplier request and two follow up requests per supplier are made if no information is received.</u>		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
Confirmed purchasing of minerals from conflict sources and no corrective action taken plan in place	1) The responsibility could be shared corporate, and facility then complete the relevant section 2 and/or 3 a) If implementation is done at corporate level, then verify 1), if not complete then "Major" b) if implementation at facility level, then verify 3) c) If implementation at both levels, then verify 2) and 3) then the highest of both rating apply 2) More than 20% of 3TG sources do not have a documented due diligence in place	Less than or equal to 20% of 3TG sources do not have a documented due diligence in place	No 3TG mineral material or containing components
Remote Verification Acceptable:	NO		

## E4) Supplier Responsibility

### E4.1 The RBA Code requirements have been communicated to the next tier suppliers

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Corporate level implementation <ul style="list-style-type: none"> <li>a) Documented corporate policy</li> <li>b) Documented corporate process</li> <li>c) Assigned responsibility</li> <li>d) Proof of implementation</li> </ul> 2) Facility level (in case no corporate level implementation) <ul style="list-style-type: none"> <li>a) Contracts for all next tier suppliers and/or PO for every single Purchase Order               <ul style="list-style-type: none"> <li>i) Enforcement language on the implementation of the RBA Code provisions applicable to the type of supplier</li> <li>ii) Labor Agents and Contractors                   <ul style="list-style-type: none"> <li>(1) Compliance with legal requirements in both home and sending country/region (if foreign and internal migrant labor used).</li> </ul> </li> </ul> </li> <li>b) Enforcement notification               <ul style="list-style-type: none"> <li>i) Contract enforcement notification are issued to the next tier supplier if Auditee becomes aware of a contract violation including a violating of the RBA code provisions</li> </ul> </li> </ul>	Applicable	Applicable (procurement staff)
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	1. The responsibility could be shared corporate, and facility then complete the relevant section 1 and/or 2 <ul style="list-style-type: none"> <li>a. If implementation is done at corporate level, then verify 1), if not complete then "Major"</li> <li>b. if implementation at facility level, then verify 2)</li> <li>c. If implementation at both levels, then verify 1) and 2) then the highest of both rating apply</li> </ul> 2. Percentage of workers working through Labor Agents and Contractors that cannot state how their employment terms and conditions meet the relevant labor requirements of the RBA code is >20%	Percentage of workers working through 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 ≤20%	No Suppliers
Remote Verification Acceptable:	Yes		

*E4.2 Next tier major suppliers have been identified*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Corporate level implementation <ul style="list-style-type: none"> <li>a) Documented corporate policy</li> <li>b) Documented corporate process</li> <li>c) Assigned responsibility</li> <li>d) Proof of implementation</li> </ul> 2) Facility level (in case no corporate level implementation) <ul style="list-style-type: none"> <li>a) Supplier identification process (identification of the next tier major suppliers, definition of what is Major)                             <ul style="list-style-type: none"> <li>i) Always includes labor agents/contractors and on-site service providers</li> </ul> </li> <li>b) Adequate and effective communication process with its the next tier major suppliers on the RBA code requirements and possible additional contract requirements:                             <ul style="list-style-type: none"> <li>i) Communication materials to Suppliers including Labor Agents/Contractors and onsite service providers</li> </ul> </li> </ul>	Applicable	Applicable (procurement staff)
Additional assistance:			
Site Observations	Record Review	Management Interview	Worker Interview
	Next tier major suppliers 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, etc.).		
Additional specific rating:			
Priority	Major	Minor	Not Applicable
See finding severity definition	1. The responsibility could be shared corporate, and facility then complete the relevant section 1 and/or 2 <ul style="list-style-type: none"> <li>a. If implementation is done at corporate level, then verify 1), if not complete then "Major"</li> <li>b. if implementation at facility level, then verify 2)</li> <li>c. If implementation at both levels, then verify 1) and 2) then the highest of both rating apply</li> </ul>	See finding severity definition	No Suppliers
Remote Verification Acceptable:	Yes		

**E4.3 Adequate and effective process to ensure that the next tier major suppliers implement the RBA Code**

**Conformance Requirements:**

Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	<ol style="list-style-type: none"> <li>1) Corporate level implementation                             <ol style="list-style-type: none"> <li>a) Documented corporate policy</li> <li>b) Documented corporate process</li> <li>c) Assigned responsibility</li> <li>d) Proof of implementation</li> </ol> </li> <li>2) Facility level (in case no corporate level implementation)                             <ol style="list-style-type: none"> <li>a) Process                                     <ol style="list-style-type: none"> <li>i) RBA code implementation verification process for Suppliers is available which includes   <ol style="list-style-type: none"> <li>(1) 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. AND/OR</li> <li>(2) audit (VAP or CMA) or an AMA (if done by a third-party Qualified Audit Firm is accepted).</li> <li>(3) Applies to all   <ol style="list-style-type: none"> <li>(a) labor Agents and Contractors</li> <li>(b) On-site service providers with assigned workers to the site</li> </ol> </li> </ol> </li> <li>ii) If during the visit or audit a major Health &amp; Safety or Environmental non-conform or risk is observed, then it will be noted in the conclusion and will require a Corrective Action plan</li> <li>iii) If there is any allegation or indication of nonconformance with an excluded Major Supplier, then an audit must be performed</li> </ol> </li> <li>b) Records                                     <ol style="list-style-type: none"> <li>i) Review of records related to A3 for on-site service provider workers as appropriate</li> <li>ii) Review of records related to A4 for on-site service provider workers as appropriate</li> </ol> </li> </ol> </li> </ol>	Applicable	Assigned on-site Service Providers  Sample size = SQRT (On site service providers) or min 5 workers

**Additional specific rating:**

Priority	Major	Minor	Not Applicable
<ol style="list-style-type: none"> <li>1. See finding severity definition</li> <li>2. For indirect full time assigned workers of on-site service providers a priority non-conformance is confirmed on provision A3 or A4</li> </ol>	<ol style="list-style-type: none"> <li>1. The responsibility could be shared corporate, and facility then complete the relevant section 1 and/or 2                             <ol style="list-style-type: none"> <li>a. If implementation is done at corporate level, then verify 1), if not complete then "Major"</li> <li>b. if implementation at facility level, then verify 2)</li> <li>c. If implementation at both levels, then verify 1) and 2) then the highest of both rating apply</li> </ol> </li> <li>2. For indirect full time assigned workers of on-site service providers a Major non-conformance is confirmed on provision A3 or A4</li> </ol>	<ol style="list-style-type: none"> <li>1. See finding severity definition</li> <li>2. For indirect full time assigned workers of on-site service providers a minor non-conformance is confirmed on provision A3 or A4</li> </ol>	E4.1 is Not applicable
Remote Verification Acceptable:	Yes		

*E4.4 Suppliers' RBA Code implementation performance and continuous improvement*

Conformance Requirements:			
Site Observations	Record Review	Management Interview	Worker Interview
Not Applicable	1) Corporate level implementation <ul style="list-style-type: none"> <li>a) Documented corporate policy</li> <li>b) Documented corporate process</li> <li>c) Assigned responsibility</li> <li>d) Proof of implementation</li> </ul> 2) Facility level (in case no corporate level implementation) <ul style="list-style-type: none"> <li>a) Supplier RBA code implementation performance process                             <ul style="list-style-type: none"> <li>(1) An obligation to go through the CAP process with the Supplier If non-conformances are detected</li> <li>(2) A commitment to not immediately de-source at a priority non-conformance discovery state but only at the non-implementation of the CAP process</li> <li>(3) Increase Supplier RBA code implementation performance to close all Priority findings.</li> </ul> </li> <li>ii) Records                             <ul style="list-style-type: none"> <li>(1) A corrective action plan for non-conformance areas identified</li> <li>(2) A verification mechanism that corrective actions are implemented</li> </ul> </li> </ul>	Applicable	Not applicable
Additional specific rating:			
Priority	Major	Minor	Not Applicable
1. No closure audits for Priority findings after CAP closure 2. No CAPs for Priority findings 3. Priority finding after CAP closure and closure audit	1. The responsibility could be shared corporate, and facility then complete the relevant section 1 and/or 2 <ul style="list-style-type: none"> <li>a. If implementation is done at corporate level, then verify 1), if not complete then "Major"</li> <li>b. if implementation at facility level, then verify 2)</li> <li>c. If implementation at both levels, then verify 1) and 2) then the highest of both rating apply</li> </ul>	See finding severity definition	E4.1 is Not applicable
Remote Verification Acceptable:	Yes		

End of Document