

## Checklist for supplier visits

The attached checklist includes a series of tangible performance indicators within each of the areas you have chosen to include in your Code of Conduct. The primary purpose of a supplier visits is to find out the extent to which the suppliers' conditions conform with these indicators.

You can gain insight into suppliers' conditions by:

- **interviewing selected employees**

It is important that you are aware of the potential risk posed to workers by asking them questions. You should therefore consider carefully the most appropriate form of questioning the workers, i.e. whether to conduct anonymous individual interviews or group interviews. Group interviews may seem less threatening to workers, and in cultures where workers are not accustomed to being asked their opinion, group interviews may be necessary to establish a dialogue. When conducting group interviews, it is important not to mix different types of workers such as middle managers and factory workers.

- **inspecting the suppliers' physical premises**

During the inspection, you could note your observations, and it could also be a good idea to take photographs if permitted by the suppliers.

- **scrutinising the suppliers' paperwork, processes etc.**

Relevant documentation could include:

- time sheets
- pay slips
- contracts of employment
- statistics for sick leave and workplace injuries
- environmental approvals
- certifications

In addition to this, it might be relevant to investigate whether there are routines and processes which can ensure employee participation and freedom of association, as well as easily accessible information about employees' rights etc

# Checklist for supplier Code of Conduct

## I. General terms and standards of the Code of Conduct

### Legal Compliance

|                                                                                                                                                                       | Comply | Not Comply | Not Applicable | Comments |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------|----------------|----------|
| The supplier complies with all national laws and regulations as well as other applicable standards (e.g. collective bargaining agreements or other Codes of Conduct). |        |            |                |          |

### 1. Forced Labour

#### 1.1 Forced Labour and Freedom of Movement

The supplier must not participate in, or benefit from, any form of forced labour including bonded labour, forced prison labour, slavery, servitude, or human trafficking. Workers must have the freedom of movement during the course of their employment.

*Suggested performance indicators:*

|                                                                                                                                                         | Comply | Not comply | Not applicable | Comments |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------|----------------|----------|
| All workers are allowed to terminate their employment after reasonable notice.                                                                          |        |            |                |          |
| All workers are allowed to leave the supplier's premises at the end of their shifts.                                                                    |        |            |                |          |
| The supplier ensures by proper investigation that it does not use labour from agencies or firms involved in trafficking, debt, bondage, or kidnapping.  |        |            |                |          |
| The supplier (or its recruiting agencies) does not charge workers with recruiting or hiring fees that require the worker to be indebted to the supplier |        |            |                |          |

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| (or recruiting agency), or to work for the supplier (or recruiting agency) to pay off the debt. |  |  |  |  |
| Salary advances to employees do not exceed three months pay and they bear no interest.          |  |  |  |  |

### 1.2 Retention of monetary and/or material goods

The supplier must not withhold any part of any personnel's salary, benefits, property or documents (e.g. identity cards and travel documents) in order to force such personnel to continue working for them.

*Suggested performance indicators:*

|                                                                                                                                                              | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| Those responsible for collecting personal data from employees are instructed not to retain original travel documents and identity cards.                     |               |                   |                       |                 |
| Supplier's records demonstrate that the supplier immediately grants letters of release whenever the letter is needed for an employee to get a job elsewhere. |               |                   |                       |                 |

### 1.3 Disciplinary measures

The supplier shall treat all personnel with dignity and respect. The supplier shall not engage in or tolerate the use of corporal punishment, mental or physical coercion and verbal abuse of personnel.

*Suggested performance indicators:*

|                                                                                                                                      | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|--------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier does not coerce or compel employees to work overtime by the use of threat or force including threats to withhold wages. |               |                   |                       |                 |
| The supplier does not engage in or tolerate that other parties use corporal punishment.                                              |               |                   |                       |                 |

## 2. Child Labour and Young Workers

## 2.1 Minimum Age Requirements

The supplier shall not engage in, or benefit from, the use of child labour. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years (or 14 years where established by national laws in accordance with the ILO developing-country exception).

*Suggested performance indicators:*

|                                                                                                                                                                                           | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier requires candidates to provide copies of birth certificates or other official forms of identification (e.g. medical) to verify their age before being hired by the supplier. |               |                   |                       |                 |
| Employee records from the past year confirm that the supplier does not employ child labourers.                                                                                            |               |                   |                       |                 |
| Hiring managers are aware of the forms of forgery commonly used in the country of operation and they are able to spot such forgeries.                                                     |               |                   |                       |                 |

## 2.2 Educational Remediation Programme

If the supplier becomes aware that it is employing children of school age, it shall ensure that the children are enrolled in a remediation programme, rather than being summarily terminated from employment. The programme shall include access to education and financial support and shall be decided in consultation with the child and family or next of kin.

*Suggested performance indicators:*

|                                                                                                                        | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has a procedure on the remediation of child labourers found to be working at its premises.                |               |                   |                       |                 |
| The supplier provides income-compensation to families of children removed from the workplace.                          |               |                   |                       |                 |
| When enrolling children in a remediation programme, the supplier makes sure to consult with the child and its parents. |               |                   |                       |                 |

### 2.3 Light Work and Apprenticeship Programmes

Where permitted by national laws, the supplier may employ children between 12 and 15 to perform a few hours of light work per day. The work must be simple tasks of a limited nature and not interfere with the children’s educational responsibilities. Apprenticeship programmes for children below the minimum age of employment must be remunerated and clearly aimed at training.

*Suggested performance indicators:*

|                                                                                                                                                                                                                                                                                                    | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| Light work performed by children below the minimum age of employment does not interfere with their educational responsibilities. And the work is characterised by simple tasks of a limited nature.                                                                                                |               |                   |                       |                 |
| The supplier establishes apprenticeship programmes (or other such measures) that ensure the basic and compulsory education of the child worker. These are limited in duration and in conjunction with a school programme, while concurrently providing practical experience and financial support. |               |                   |                       |                 |
| Payroll records show that young workers receive equal pay for equal work.                                                                                                                                                                                                                          |               |                   |                       |                 |

### 2.4 Hazardous and Harmful Work

The supplier shall refrain from hiring young workers (below 18 years of age) to perform any type of work, which is likely to jeopardise their health, safety or morals.

*Suggested performance indicators:*

|                                                                                                                                                                  | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
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| The supplier has guidelines in place defining what tasks are prohibited as hazardous or harmful to the health, safety, or morals of workers under the age of 18. |               |                   |                       |                 |
| The supplier does not hire or have contract with workers under the age of 18 to perform work that exposes them:                                                  |               |                   |                       |                 |

|                                                                                                                                                                                                                                                                                                                                                                                                             |  |  |  |  |
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| a) psychological or sexual abuse, b) work underground, under water, at dangerous heights or in confined spaces, c) work with dangerous machinery, equipment and tools or to manhandle or transport heavy loads, d) work that exposes them to hazardous substances, agents or processes. And, to temperatures, noise levels, or vibrations damaging to their health. e) work for long hours during the night |  |  |  |  |
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### 3. Discrimination

#### 3.1 Discrimination in Employment-related Decisions

The supplier shall not engage in or support discrimination on the basis of race, colour, sex, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age, and disability or other distinguishing characteristics. Hiring, remuneration, benefits, training, advancement, discipline, termination, retirement or any other employment-related decisions shall be based on relevant and objective criteria.

*Suggested performance indicators:*

|                                                                                                                                                                                                                     | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has policies and procedures in place to ensure that all employment-related decisions are based only on relevant and objective factors.                                                                 |               |                   |                       |                 |
| Hiring managers receive training regarding the supplier's non-discrimination policies.                                                                                                                              |               |                   |                       |                 |
| Workers have access to a complaint mechanism where they can report complaints of discrimination, and they are familiar with the mechanism.                                                                          |               |                   |                       |                 |
| The supplier does not require applicants or employees to take HIV/AIDS tests, pregnancy tests, get abortions, use contraception, sign agreements not to become pregnant or disclose personnel HIV/AIDS information. |               |                   |                       |                 |

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| Wage records do not show pay discrepancies for work of equal value. |  |  |  |  |
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## 4. Freedom of Association

### 4.1 The Right to Freedom of Association and Collective Bargaining

The supplier must not interfere with the workers' rights to form and join unions or other associations of their own choosing, and to bargain collectively. Nor shall the supplier discourage membership of unions. Workers' representatives shall not be subject to discrimination and shall be given access to employees at the workplace. The supplier must recognise elected workers' representatives and bargain in good faith with them regarding all important concerns at the workplace.

*Suggested performance indicators:*

|                                                                                                                                       | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|---------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier does not seek to control workers' organisations or favour one workers' organisation above another.                       |               |                   |                       |                 |
| The supplier engages in collective bargaining and holds regular                                                                       |               |                   |                       |                 |
| The supplier allows workers' representatives reasonable access to                                                                     |               |                   |                       |                 |
| Copies of the current collective bargaining agreements are available and the supplier confirms that it honours the signed agreements. |               |                   |                       |                 |

### 4.2 Alternative Measures in Case of State Prohibition on Unions

If trade unions are not allowed in the area of operation, or only state authorised organisations are allowed, then the supplier shall facilitate, and not prevent, alternative measures to allow employees to gather independently to discuss work-related matters and a forum to present work-related concerns to management.

*Suggested performance indicators:*

|                                                                                                                                           | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
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| The supplier allows employees to engage in regular employee meetings, where employees can freely discuss concerns regarding their working |               |                   |                       |                 |

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| conditions.                                                                                                                                           |  |  |  |  |
| Management meets regularly with workers' representatives to discuss work-related problems and any complaints or concerns employees may wish to raise. |  |  |  |  |

## 5. Workplace Health and Safety

### 5.1 Health and Safety Standards

The supplier shall ensure that its workers are offered a safe and healthy working environment. This should include but not limited to protection from fire, accidents and toxic substances. Adequate health and safety policies and procedures must be established and followed.

*Suggested performance indicators:*

|                                                                                                                                                                                            | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier's health and safety standards and procedures are made available to employees in a language they understand.                                                                   |               |                   |                       |                 |
| The supplier has appointed a qualified health and safety officer at each facility, who is responsible for planning, implementing and monitoring health and safety policies and procedures. |               |                   |                       |                 |
| The supplier documents accidents and adjusts its processes to prevent recurring problems.                                                                                                  |               |                   |                       |                 |
| Health and safety inspections confirm that the supplier provides a safe and healthy working environment.                                                                                   |               |                   |                       |                 |

### 5.2 Training and Protective Gear

The supplier shall provide its employees with the protective equipment and training necessary to perform their tasks safely.

*Suggested performance indicators:*

|  | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
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|  |               |                   |                       |                 |

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| Workers and managers are trained to respond to workplace emergencies and first aid kits are readily available.                                                                                          |  |  |  |  |
| Emergency procedures are rehearsed with managers and workers, at least on an annual basis.                                                                                                              |  |  |  |  |
| All workers are protected against processes, substances and techniques, which are unhealthy, toxic or harmful.                                                                                          |  |  |  |  |
| An accurate record is kept by the supplier detailing who has been trained, for what tasks the employee has been trained, how he/she has been trained (duration, method), and by whom (name of trainer). |  |  |  |  |

### 5.3 Sanitary Infrastructure

The supplier must provide a suitable, clean and sanitary infrastructure, including access to toilets and potable water, which conforms to the needs and numbers of its employees. Accommodation, if provided by the supplier, shall conform to the same requirements, including the general provisions on health and safety standards listed above.

*Suggested performance indicators:*

|                                                                                                                                                                                                                                                                              | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| Work premises are maintained and kept clean.                                                                                                                                                                                                                                 |               |                   |                       |                 |
| Sufficient and suitable washing facilities and sanitary conveniences are provided and properly maintained.                                                                                                                                                                   |               |                   |                       |                 |
| Kitchen, canteen and designated eating areas are clean and sanitary in a protected or covered area, as well as clean and sanitary food storage facilities are available for all employees.                                                                                   |               |                   |                       |                 |
| Residential or overnight facilities are clean and sanitary, adequately lit, have proper fire precautions, and have fans, air conditioners or heaters to provide adequate circulation, ventilation and temperature control. The facilities should also contain mats, beds and |               |                   |                       |                 |

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| personal storage facilities to all employees.                                                                                                          |  |  |  |  |
| If employees use uniforms or other work-specific clothing, the supplier provides suitable facilities for changing, storing, and drying their clothing. |  |  |  |  |

## 6. Conditions of Employment and Work

### 6.1 Workplace Violence, including Assault, Harassment and Threats

The supplier shall protect workers from acts of physical, verbal, sexual, or psychological harassment, abuse, or threats in the workplace, whether committed by managers or fellow workers including when determining and implementing disciplinary measures.

*Suggested performance indicators:*

|                                                                                                                                                                                  | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier promptly investigates all complaints of workplace violence, harassment, and threats and takes appropriate preventative and disciplinary action.                     |               |                   |                       |                 |
| The supplier maintains written records of disciplinary measures taken.                                                                                                           |               |                   |                       |                 |
| The supplier uses appropriate and progressive disciplinary measures, beginning with verbal or written warning before further action is taken, such as suspension or termination. |               |                   |                       |                 |

### 6.2 Remuneration

The supplier shall comply with legal minimum standards or industry benchmark standards concerning wages and benefits, whichever is higher. In any case, the supplier shall always provide a ‘living wage’, which enables workers to meet the basic needs of themselves and their dependents, as well as provide some discretionary income. Overtime shall be remunerated at a premium rate. Wages shall be paid in legal tender and on a regular basis. Deductions from wages shall be transparent and must never be used as a disciplinary measure.

*Suggested performance indicators:*

|  | <b>Comply</b> | <b>Not</b> | <b>Not</b> | <b>Comments</b> |
|--|---------------|------------|------------|-----------------|
|--|---------------|------------|------------|-----------------|

|                                                                                                                                                                                                                                                                                                         |  | <b>comply</b> | <b>applicable</b> |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|---------------|-------------------|--|
| The supplier recognises that its workers are entitled to a “living wage”, which means a wage sufficient to meet basic food, clothing and housing needs, as well as provide for some discretionary income. Overtime should not be required for workers to earn a “living wage”.                          |  |               |                   |  |
| If there is no national minimum wage or if standards of the national minimum wage are insufficient to qualify as a ‘living wage’, then, the supplier is in a dialogue with the relevant stakeholder, such as local trade unions, to seek guidance on a proper standard of a minimum wage in the region. |  |               |                   |  |
| The supplier pays its employees a minimum of 1.25 times the normal rate for overtime hours.                                                                                                                                                                                                             |  |               |                   |  |
| The supplier pays wages at regular times, in legal tender and directly to the worker.                                                                                                                                                                                                                   |  |               |                   |  |
| The supplier does not take deductions from wages for disciplinary measures and other deductions, which are not authorised by national law without the freely given consent of the employee.                                                                                                             |  |               |                   |  |

### 6.3 Established Working Relationship

All workers shall be provided with a written, understandable, and legally binding labour contract. The supplier shall not rely on part-time, short-term or casual labourers, trainees or false apprenticeships to pay lower wages and fewer benefits. Provisions for non-permanent and seasonal workers should be no less favourable than for permanent workers.

*Suggested performance indicators:*

|                                                                                           | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|-------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| Workers are provided with a written, understandable, and legally binding labour contract. |               |                   |                       |                 |
| Apprentices or new workers, who                                                           |               |                   |                       |                 |

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| receive training have a well-defined training programme, receive adequate pay during their training period and the length of the training period is made explicit. |  |  |  |  |
| Part-time and short-term employees are provided with benefits, including holiday leave, on a pro rata basis.                                                       |  |  |  |  |

#### 6.4 Leave

The supplier shall grant employees paid holiday and sick leave each year, as well as parental leave to employees who must care for a newborn or newly adopted child. Women, who take maternity leave, must not face dismissal or threat of dismissal, and shall be able to return to work in their former employment at the same rate of pay and benefits.

*Suggested performance indicators:*

|                                                                                                                                                                                                  | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| Employees, who have worked for one year, are granted at least three weeks of paid holiday leave per year.                                                                                        |               |                   |                       |                 |
| Employees are provided with paid sick leave in accordance with national law requirements. If national law provides no guidance or only limited protection, the supplier follows ILO conventions. |               |                   |                       |                 |
| The supplier grants parental leave to employees, who must care for a newborn, newly adopted child or other dependent children.                                                                   |               |                   |                       |                 |
| Parents, who take parental leave can return at the same rate of pay and benefits and be able to take parental leave without threats of dismissal.                                                |               |                   |                       |                 |

#### 6.5 Hours of Work, Rest Periods and Breaks

The supplier shall ensure that the work-week is limited to 48 hours. Overtime shall be voluntary, infrequent, and must not exceed 12 hours per week. Employees are entitled to at least one day off per week, and shall be given reasonable breaks while working and sufficient rest periods between shifts.

*Suggested performance indicators:*

|                                                                                                                                                                     | <b>Comply</b> | <b>Not<br/>comply</b> | <b>Not<br/>applicable</b> | <b>Comments</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------------|---------------------------|-----------------|
| Prior to employment, the supplier informs workers of its policy on working hours and overtime work.                                                                 |               |                       |                           |                 |
| Employees are allowed at least 24 consecutive hours of rest in every seven day period.                                                                              |               |                       |                           |                 |
| Employees are given no less than a 30-minute break for every 4 hours of work or longer if the nature of the work or national laws or industry standards so require. |               |                       |                           |                 |
| The supplier informs workers in advance of the nature and expected duration of any overtime work.                                                                   |               |                       |                           |                 |
| The supplier does not encourage employees to avoid taking breaks by rewarding those who do not use their break time.                                                |               |                       |                           |                 |
| The supplier uses an accurate and reliable system to document working hours for all all employees.                                                                  |               |                       |                           |                 |

## 6.6 Employee Privacy

The supplier shall respect the privacy rights of its employees whenever it gathers or keeps private information or implements employee-monitoring practices.

*Suggested performance indicators:*

|                                                                                                                                                                                                                                | <b>Comply</b> | <b>Not<br/>comply</b> | <b>Not<br/>applicable</b> | <b>Comments</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------------|---------------------------|-----------------|
| The supplier's policies or guidelines state what kind of personal information is retained on employees, where it is stored, who has access, and why the information is necessary.                                              |               |                       |                           |                 |
| The supplier does not attempt to gain information from an individual with whom the employee has a privileged relationship without the employee's prior consent. The privileged individual could be a spouse, doctor or lawyer. |               |                       |                           |                 |

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| Employees are made aware of all workplace monitoring.                                                                                                                                         |  |  |  |  |
| Employees are given access – upon request – to all personal data collected about them including data obtained through monitoring.                                                             |  |  |  |  |
| The supplier does not reveal, retain or misuse any personal data about an employee that has been collected during the monitoring process.                                                     |  |  |  |  |
| The collection of data and the use of monitoring are accomplished in a non-discriminatory manner, and there should be no use of monitoring mechanisms in toilet facilities or changing rooms. |  |  |  |  |

## 7. Use of Company Security Forces

### 7.1 Company Security Forces

The supplier shall prevent its security guards from violating the liberty and security of others. Security guards shall be trained to know when to intervene in security-related situations and how to use the minimal force necessary.

*Suggested performance indicators:*

|                                                                                                                                                                                                            | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has a policy manual clearly defining the role and responsibility of security guards.                                                                                                          |               |                   |                       |                 |
| All security guards are carefully trained to handle different types of security situations to enable them to fully understand their duties and properly exercise their authority.                          |               |                   |                       |                 |
| Security guards who use unnecessary or excessive force are reprimanded, disciplined or dismissed. Actions depend on the severity of the offence, and all incidents are reported to the proper authorities. |               |                   |                       |                 |

### 7.2 Relations to State Security Forces

The supplier shall take all reasonable measures to avoid involvement or complicity in human rights violations in its relationships and interactions with state security forces.

*Suggested performance indicators:*

|                                                                                                                                                                                                                                                                                          | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has a policy manual clearly defining the role and responsibility of security guards.                                                                                                                                                                                        |               |                   |                       |                 |
| In high-risk areas, where human rights violations are committed by state security forces or linked vigilante groups for the purposes of promoting corporate enterprise, the supplier has made its zero-tolerance policy clear to the government, and continually monitors the situation. |               |                   |                       |                 |

## **8. Land Management**

### **8.1 Purchase of Land**

Before purchasing land, the supplier shall seek the prior and informed consent of all legal and/or customary owners.

*Suggested performance indicators:*

|                                                                                                                                                                                                                              | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has a method in place to verify all existing claims and titles to land under state law and the law and customs of indigenous peoples.                                                                           |               |                   |                       |                 |
| The supplier is committed to clarify and settle all existing claims and conflicts of land title in compliance with international human rights law or state law, whichever is more protective of the rights of the claimants. |               |                   |                       |                 |
| The supplier does not take any coercive measures to affect land use by local people in order to obtain a transfer of their property interests.                                                                               |               |                   |                       |                 |
| The supplier respects any passage or                                                                                                                                                                                         |               |                   |                       |                 |

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| temporary usage rights of local or indigenous peoples on its land without harassment or intimidation. |  |  |  |  |
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## 8.2 Relocation

The supplier shall ensure that it does not participate in or benefit from improper forced relocations. The supplier shall also adequately compensate inhabitants in legitimate relocations.

*Suggested performance indicators:*

|                                                                                                                                                                                                                                                                         | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has a procedure for ensuring that it is not complicit in any forced relocations, unless the relocation is done in conformity with international law.                                                                                                       |               |                   |                       |                 |
| When purchasing or renting property from governments or other large-scale land owners, the supplier investigates the occupation of the land to ensure that no forced relocations have been performed, unless these have been done in conformity with international law. |               |                   |                       |                 |
| The supplier ensures that adequate compensation (housing, land, money, etc.) is provided to all affected parties in case of any relocation.                                                                                                                             |               |                   |                       |                 |

## 9. Environmental protection and industrial accidents

### 9.1 Managing Environmental Aspects

*Suggested performance indicators:*

|                                                                                                                                                          | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier maintains procedures for the mapping and assessment of environmental impacts from its activities, products and services on a regular basis. |               |                   |                       |                 |
| Targets for improvement of                                                                                                                               |               |                   |                       |                 |

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| environmental performance are managed in action plans, which describe the targets, timeframes, responsibilities and the means of obtaining the targeted improvement.                             |  |  |  |  |
| Any changes in the supplier's activities, products, and services or other site changes result in a new mapping and assessment of environmental impacts and possible new or changed action plans. |  |  |  |  |

## 9.2 Complying with Environmental Legislation

The supplier shall maintain awareness of current environmental legislative requirements, which are relevant to the environmental impacts of its activities, products and services. Also, it must ensure legal compliance through training, awareness, operational control and monitoring.

*Suggested performance indicators:*

|                                                                                                                                                                                                                                                                   | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has made arrangements to receive relevant knowledge of new environmental legislation upon issue. And it ensures that new legislative requirements are brought to the knowledge of relevant work functions and at relevant levels of the organization |               |                   |                       |                 |
| Personnel involved in activities and/or services that result in, or have a potential to result in, significant environmental impacts are trained on a regular basis to ensure awareness of risks, impacts, requirements and agreed procedures.                    |               |                   |                       |                 |
| Activities and/or services that result in, or have a potential to result in significant environmental impacts are planned in order to ensure that they are handled under safe conditions and following agreed procedures.                                         |               |                   |                       |                 |
| The supplier continuously monitors its resource consumption, emissions, storage volumes of hazardous                                                                                                                                                              |               |                   |                       |                 |

|                                                                                                                                                         |  |  |  |  |
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| substances and other environmental aspects. This is done in order to be in legal compliance and meet the targets set in the environmental action plans. |  |  |  |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|

### 9.3 Continuously Improving Environmental Performance

The supplier shall demonstrate continuous improvements of the overall environmental performance related to significant environmental aspects.

*Suggested performance indicators:*

|                                                                                               | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|-----------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier performs a yearly documented management review of its environmental performance. |               |                   |                       |                 |

### 9.4 Industrial Accidents and Health Emergencies

The supplier shall establish and maintain emergency procedures to effectively prevent and address all health emergencies and industrial accidents that can affect the surrounding community or have an adverse impact on the environment.

*Suggested performance indicators:*

|                                                                                                                                                                                                                                                                        | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has a policy with detailed emergency procedures, prevention plans, and training programmes to protect against dangers and to handle emergencies.                                                                                                          |               |                   |                       |                 |
| The supplier has a clearly audible/visible alarm system that warns nearby communities of potential emergencies. And, if necessary the supplier has also developed emergency community evacuation plans with the appropriate local, regional, and national authorities. |               |                   |                       |                 |
| If the site is located far away from a hospital, then the supplier has adequate medical resources and competent staff to provide preliminary relief and                                                                                                                |               |                   |                       |                 |

|                                                                                                                                                    |  |  |  |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| treatment to people, who might suffer the consequences of an industrial accident.                                                                  |  |  |  |  |
| The supplier's emergency response procedures comply with the industry standard in the country of operation, or exceed the standard when necessary. |  |  |  |  |

## 10. Company Products

### 10.1 Products Liability

The supplier shall exercise due diligence when designing, manufacturing, and testing products. This is to protect against product defects which could harm the life, health or safety of people likely to be affected by the defective product, or have an adverse impact on the environment.

*Suggested performance indicators:*

|                                                                                                                                                                                  | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier conducts a predevelopment assessment of product risks.                                                                                                              |               |                   |                       |                 |
| The supplier has a process for ensuring that its products are safe for the intended use, and for reasonably foreseeable uses.                                                    |               |                   |                       |                 |
| The supplier takes all measures to eliminate any ingredients, designs, defects or side effects that could harm or threaten human life and health.                                |               |                   |                       |                 |
| The supplier provides clear warnings about hazards associated with the product, and proper user's instructions on all packaging or products.                                     |               |                   |                       |                 |
| If there are reported injuries or deaths associated with the proper use of a certain product, then the supplier immediately makes the danger known to the relevant stakeholders. |               |                   |                       |                 |

## 11. Corruption and Bribery

### 11.1 Bribing of Government Officials and private parties

The supplier shall refrain from bribing, or using any other method, to unjustly influence public officials, the judiciary and/or private parties.

*Suggested performance indicators:*

|                                                                                                                                                                                                                                                 | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has a written policy against unjustly influencing and bribing public officials and private partners, or engaging in any other methods that subvert the representative process of government, the judiciary and/or private parties. |               |                   |                       |                 |
| The supplier has guidelines instructing employees in how not to engage in bribery and corruption. These are made available to all employees, particularly those who are involved in legal matters relating to company business.                 |               |                   |                       |                 |
| The supplier sends two or more people to meetings with government officials in order to discourage practices of bribery and corruption.                                                                                                         |               |                   |                       |                 |
| The supplier is transparent about facilitation payments and actively works to eliminate them.                                                                                                                                                   |               |                   |                       |                 |

## **11.2 Agents, intermediaries and consultants**

The suppliers' contracts with agents, intermediaries and consultants shall include a section on anti-corruption and that the contract holder must comply with all applicable laws and regulations.

*Suggested performance indicators:*

|                                                                                                                                                          | <b>Comply</b> | <b>Not comply</b> | <b>Not applicable</b> | <b>Comments</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| All agreements with agents, intermediaries and consultants are fully documented in written, signed contracts.                                            |               |                   |                       |                 |
| The supplier has guidelines instructing agents, intermediaries and consultants in how not to engage in bribery and corruption. These are included in all |               |                   |                       |                 |

|                                                        |  |  |  |  |
|--------------------------------------------------------|--|--|--|--|
| contracts with agents, intermediaries and consultants. |  |  |  |  |
|--------------------------------------------------------|--|--|--|--|

## II. Implementation of the Code of Conduct

### Records and Documentation

|                                                                                                                    | Comply | Not Comply | Not Applicable | Comments |
|--------------------------------------------------------------------------------------------------------------------|--------|------------|----------------|----------|
| The supplier maintains appropriate records to demonstrate compliance with the terms of the Code                    |        |            |                |          |
| Names and ages of all workers                                                                                      |        |            |                |          |
| Time sheets                                                                                                        |        |            |                |          |
| Payroll records including wage slips and overtime wage records                                                     |        |            |                |          |
| Material safety data sheets, accident records and relevant health and safety certificates and permits              |        |            |                |          |
| Environmental records including data from the monitoring of significant environmental impacts and relevant permits |        |            |                |          |
| Records of any significant instances of non-compliance encountered in relation to the Code                         |        |            |                |          |
| Records of corrective actions taken to remedy deficiencies                                                         |        |            |                |          |

### Definition of Roles and Responsibilities

|                                                                                                                                                                                                   | Comply | Not Comply | Not Applicable | Comments |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------|----------------|----------|
| The supplier has assigned responsibilities within its organisation for the implementation of the Code                                                                                             |        |            |                |          |
| The supplier has appointed a management representative(s) with the responsibility and authority to ensure compliance with the terms of the Code.                                                  |        |            |                |          |
| The supplier has appointed a qualified health and safety officer at each facility responsible for planning, implementing and monitoring the supplier's health and safety policies and procedures. |        |            |                |          |

|                                                                                                                                                                                                                                     | <b>Comply</b> | <b>Not Comply</b> | <b>Not Applicable</b> | <b>Comments</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| Workers have freely elected a representative responsible for facilitating dialogue and communication between the supplier and its employees on all matters relating to the Code.                                                    |               |                   |                       |                 |
| The supplier ensures that repeated offences and serious neglect by any of its personnel in relation to matters pertaining to the Code will result in appropriate disciplinary actions, which may include dismissal from employment. |               |                   |                       |                 |

### **Training and Awareness Raising**

|                                                                                                                                                                               | <b>Comply</b> | <b>Not Comply</b> | <b>Not Applicable</b> | <b>Comments</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The standards included in the Code are communicated to all new employees including managers and supervisors, immediately upon hiring.                                         |               |                   |                       |                 |
| The supplier ensures that all employees are regularly informed about the standards and terms of the Code of Conduct, as well as the necessity to act in accordance with them. |               |                   |                       |                 |
| The supplier ensures that in areas with high illiteracy rates, employees receive verbal instructions.                                                                         |               |                   |                       |                 |
| The Code is always accessible to all employees and in the local languages whenever appropriate.                                                                               |               |                   |                       |                 |
| The Code is transmitted to local unions or other workers' representatives.                                                                                                    |               |                   |                       |                 |

### **Complaints Procedures**

|                                                                                                                                                                                                                                   | <b>Comply</b> | <b>Not Comply</b> | <b>Not Applicable</b> | <b>Comments</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier has established mechanisms for hearing, processing, and settling complaints of employees.                                                                                                                            |               |                   |                       |                 |
| Workers have the right to anonymously submit complaints regarding all workplace concerns, including complaints regarding the supplier's failure to comply with the Code, without fear of punishment or adverse employment action. |               |                   |                       |                 |
| The supplier properly investigates, addresses and settles all complaints in accordance with its pre-                                                                                                                              |               |                   |                       |                 |

|                                                                                                                                                                                                                                                                     | <b>Comply</b> | <b>Not Comply</b> | <b>Not Applicable</b> | <b>Comments</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| established complaints procedure.                                                                                                                                                                                                                                   |               |                   |                       |                 |
| Anyone affected by the supplier's activities has access to communicate concerns or submit complaints without discrimination or fear of reprisals. The supplier properly investigates, addresses and settles any complaints or concerns raised by local communities. |               |                   |                       |                 |

### **Relations to Sub-suppliers**

|                                                                                                                                                                | <b>Comply</b> | <b>Not Comply</b> | <b>Not Applicable</b> | <b>Comments</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------------------|-----------------------|-----------------|
| The supplier ensures that its respective sub-suppliers, including home-based workers or small farmers, comply with the terms and standards of the Code.        |               |                   |                       |                 |
| The supplier requires sub-suppliers to inform the supplier about other business entities in the supply chain, which take part in the production of each order. |               |                   |                       |                 |
| The supplier screens and selects sub-suppliers based on their ability to meet the standards and terms of the Code.                                             |               |                   |                       |                 |
| The supplier makes compliance to the terms and standards of the Code a condition of any agreement or contract that it enters into with sub-suppliers.          |               |                   |                       |                 |
| The supplier undertakes reasonable efforts to check that sub-suppliers operate in conformance with the Code.                                                   |               |                   |                       |                 |