ET111a: BRCGS Ethical Trade and Responsible Sourcing

Issue 1 Auditor Checklist and
Site Self-Assessment Tool

# 1 Senior management commitment

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| 1.1 Senior management commitment and continual improvement |
| **Fundamental** | The site’s senior management shall demonstrate they are fully committed to the implementation of the requirements of the Global Standard for Ethical Trade and Responsible Sourcing and to policies, processes and procedures which facilitate continual improvement of responsible sourcing, working and workplace conditions. |
| Clause | Requirements | Conforms | Comments |
| 1.1.1 | There shall be written policies that are signed off by senior management, showing the site’s commitment to:* the elimination of all child labour (including no new recruitment of children) and the protection of the rights of young workers
* the elimination and prevention of all discrimination within its operation – including the unjust, unfair or prejudicial treatment of different categories of people
* ensuring the health, safety and welfare of its workers
* respecting, protecting and avoiding the infringement of the human rights of others
* anti-bribery, anti-corruption and fraud prevention
* information security.

All written policies shall form the basis of the site’s ethical trade and responsible sourcing management system, referring to its intention to meet its obligation to comply with local, national and international laws, all relevant regulation, the principles of responsible sourcing, the protection of basic human rights, its responsibility to its workers and in support of customer codes and requirements. |  |  |
| 1.1.2 | The site shall ensure that it has adequate and effective procedures in place to implement and adhere to the requirements of its ethical trade and responsible sourcing management system. |  |  |
| Clause | Requirements | Conforms | Comments |
| 1.1.3 | The site’s ethical trade and responsible sourcing management system shall have clear objectives that are defined by senior management and related to the delivery of the commitments outlined in the written policies, to maintain and improve labour standards, human rights, health and safety, corporate governance and reputation, in accordance with this Standard. |  |  |
| 1.1.4 | The site’s senior management shall have a system in place to ensure that changes in legislation, responsible sourcing, health and safety and industry codes of practice are monitored so that new requirements are reflected in its policies and ethical trade and responsible sourcing management system. |  |  |
| 1.1.5 | The site shall have an original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or audit protocol that are published on the BRCGS website. |  |  |
| 1.1.6 | The site shall identify its key stakeholders and ensure that it communicates its responsible sourcing, human rights and labour standards policy requirements to them. |  |  |
| 1.1.7 | The site shall ensure that all key personnel (including management and worker representatives) shall participate in the opening and closing meetings of the audit for the Standard. |  |  |
| 1.2 Allocation of adequate resource |
|  | The site must provide adequate (capacity) and appropriate (capability) resource to enable the effective fulfilment of its ethical trade and responsible sourcing management system obligations. |
| Clause | Requirements | Conforms | Comments |
| 1.2.1 | The site’s senior management shall provide the human and financial resources required to operate safely and in compliance with the requirements of this Standard. |  |  |
| Clause | Requirements | Conforms | Comments |
| 1.2.2 | The site shall appoint a member of senior management to have overall responsibility for compliance with the Standard and the site’s ethical trade and responsible sourcing management system obligations. The appointment shall be in writing and reflected in the individual’s job description. |  |  |
| 1.2.3 | The site shall ensure that the senior manager appointed has the necessary knowledge and understanding of the requirements of this Standard and the site’s ethical trade and responsible sourcing management system obligations to effectively fulfil their responsibilities. |  |  |
| 1.2.4 | The site will ensure that management and workers at all levels (particularly those in stakeholder-facing roles) receive training to support compliance with the Standard and understand the requirements of the policies, objectives and procedures of the ethical trade and responsible sourcing management system and how the policies protect their human rights. |  |  |
| 1.3 Management review and performance monitoring |
|  | The site’s senior management shall monitor and review performance to ensure compliance with the requirements of this Standard, correcting non-conformities when detected, and identify areas for improvement. |
| Clause | Requirements | Conforms | Comments |
| 1.3.1 | The site’s senior management shall put in place a process that shall require them to hold regular management review meetings (annually as a minimum), to assess the performance of the ethical trade and responsible sourcing management system (as required in clause 1.1.2) and its compliance with the Standard. |  |  |
| 1.3.2 | The site’s senior management shall ensure that the management review process includes the evaluation of its performance against its objectives, targets, key performance indicators (KPIs), corrective action or improvement plans and the effectiveness of the ethical trade and responsible sourcing management system. |  |  |
| 1.3.3 | The site shall ensure that records of the meeting are documented and used to revise the objectives, targets, KPIs and any corrective action or improvement plans. |  |  |
| 1.3.4 | The site shall effectively communicate decisions and actions agreed during the management review process to all levels of management and staff, with responsibilities allocated and actions implemented within agreed timescales. |  |  |
| 1.4 Worker awareness |
|  | The site must ensure that workers are aware of their rights and responsibilities in the workplace, so they can support the principles of ethical trade and responsible sourcing (including customer codes and requirements), ensuring they are effectively implemented and upheld. |
| Clause | Requirements | Conforms | Comments |
| 1.4.1 | The site shall ensure that workers are made aware of labour standards and basic human rights and understand how the policies and procedures of the ethical trade and responsible sourcing management system protect these rights and support customer codes and requirements. These policies shall be communicated to them in a language that they understand and a copy shall be made available to them. |  |  |
| 1.4.2 | The site shall have a worker meeting programme, where meetings shall be held at least quarterly, allowing workers and senior management to discuss and jointly resolve issues relating to ethical trade and responsible sourcing. |  |  |
| 1.5 Grievance mechanisms |
| 1.5.1 Internal grievance mechanism |
|  | The site shall ensure that workers have access to a working, effective and confidential grievance mechanism to raise concerns about management practices, labour standards, human rights and health and safety issues. |
| Clause | Requirements | Conforms | Comments |
| 1.5.1.1 | The site shall have a confidential reporting system (that is clearly communicated to management and workers) to enable workers to report concerns without fear of reprisal. |  |  |
| 1.5.1.2 | The site shall have a grievance procedure (that is clearly communicated to management and workers) that governs the investigation and resolution of grievances. |  |  |
| 1.5.1.3 | In cases where grievances have been raised, the grievance procedure shall ensure that senior management, while respecting confidentiality and anonymity, act on and seek mutually agreed solutions to such grievances within an agreed timeframe. All actions shall be documented. |  |  |
| 1.5.1.4 | The site shall ensure that there are effective measures in place to safeguard workers who raise grievances from victimisation and/or retaliation. |  |  |
| 1.5.2 External complaints |
|  | The site shall handle external complaints effectively, understanding and managing the expectations of stakeholders and using information accrued from investigations to reduce recurring complaint levels. |
| Clause | Requirements | Conforms | Comments |
| 1.5.2.1 | The site shall have a procedure to manage external complaints, ensuring they are fully investigated and remediating actions recorded. |  |  |
| 1.5.2.2 | The site shall implement recommendations arising from investigations, ensuring that remediating actions are recorded, appropriate to the seriousness and frequency of the complaint and completed promptly by appropriately trained staff. |  |  |
| 1.5.2.3 | The site shall communicate the outcome of an investigation into an external complaint and any remediating actions to the relevant staff and stakeholders. |  |  |
| 1.5.2.4 | The site shall analyse external complaint data for trends and where a significant increase of a complaint is identified, root cause analysis shall define the remediating actions and ongoing improvements to avoid recurrence. The outcomes and actions shall be made available to relevant staff. |  |  |

# 2 Ethical trade and responsible sourcing management system

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| 2.1 Ethical trade and responsible sourcing manual |
|  | The site’s processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in all aspects related to ethical trade and responsible sourcing. |
| Clause | Requirements | Conforms | Comments |
| 2.1.1 | The site’s documented procedures, working methods and practices shall be available and accessible to all management and workers. |  |  |
| 2.1.2 | The site shall ensure that all procedures and work instructions are communicated effectively by appropriate methods. The instructions and procedures shall be clearly legible, unambiguous and sufficiently detailed to enable their correct application by appropriate staff. |  |  |
| 2.2 Documentation control |
|  | The site shall operate an effective document control system to ensure that only the correct versions of documents, including recording forms, are available and in use. |
| Clause | Requirements | Conforms | Comments |
| 2.2.1 | The site shall have a procedure to manage and control all documents which form part of the ethical trade and responsible sourcing management system. These documents should include:* a list of all controlled documents indicating the latest version number
* the method used for the identification and authorisation of controlled documents
* a record of the reason for any changes or amendments to documents
* the system for the replacement of existing documents when they are updated.

Where documents are stored in electronic form they shall also be:* stored securely (with authorised access, control of amendments or password protected)
* backed up to prevent loss.
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| 2.3 Record completion and maintenance |
|  | The site shall maintain genuine paper and/or electronic records to demonstrate the effective implementation and control of activities related to ensuring that its ethical trade and responsible sourcing policies, working practices and procedures are adhered to. |
| Clause | Requirements | Conforms | Comments |
| 2.3.1 | The site shall ensure records (either paper or electronic) are legible, maintained in good condition, accessible and retrievable. Any alterations to records shall be authorised and justification for alteration shall be recorded. When records are in electronic form, they shall also be: * stored securely (with authorised access, control of amendments or password protected)
* backed up to prevent loss.
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| 2.3.2 | The site shall retain paper and/or electronic records for a minimum of 5 years and in line with legal and customer requirements. |  |  |
| 2.4 Internal audits |
| Fundamental | The site shall be able to demonstrate that it verifies the effective application of the ethical trade and responsible sourcing management system and its compliance with the requirements of the Standard. |
| Clause | Requirements | Conforms | Comments |
| 2.4.1 | The site shall instigate an internal audit programme that assesses the effectiveness of the ethical trade and responsible sourcing management system and procedures implemented to achieve compliance with the Standard. This must include a review of all identified risks and previous audit performance. |  |  |
| 2.4.2  | The site shall ensure that the internal audit programme checks all areas of the ethical trade and responsible sourcing management system once a year. |  |  |
| 2.4.3  | The site shall ensure that internal audits are carried out by appropriately trained, independent, competent internal auditors. |  |  |
| 2.4.4  | The site shall ensure that internal audit reports identify compliance as well as non- compliance and are communicated to the responsible manager, who will then inform the personnel involved with the audited activity. Corrective actions and timescales for their implementation shall be agreed and completion of the actions verified. |  |  |
| 2.4.5  | In addition to the programme of internal audits, the site shall carry out other documented reviews to ensure that all documentation remains compliant with the requirements of the Standard and legal requirements. The frequency of these inspections shall be based on risk. |  |  |
| 2.5 Corrective and preventive actions |
| Fundamental | The site shall be able to demonstrate that it uses the information from all identified non- conformities in the ethical trade and responsible sourcing management system to conduct root cause analysis and make the necessary corrective actions to prevent recurrence. |
| Clause | Requirements | Conforms | Comments |
| 2.5.1 | Where a non-conformity compromises labour standards, human rights, health and safety, corporate governance and/or reputation, the site shall have a procedure to investigate and record the actions taken, including:* clear documentation of the non-conformity
* assessment of consequences by a suitably competent and authorised person
* the action to address the immediate issue
* an appropriate timescale for correction
* the person responsible for correction
* verification that the correction has been implemented and is effective.
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| 2.5.2 | The site shall have a procedure for the completion of root cause analysis. As a minimum, root cause analysis shall be used to implement ongoing improvements and to prevent recurrence of non-conformities when:* analysis of non-conformities for trends shows there has been a significant increase in a type of non-conformity
* a non-conformity relates to labour standards, human rights, health and/or safety, corporate governance or reputation.
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| 2.5.3 | Where cases of forced, bonded or child labour or human trafficking are discovered, either within the site’s own operations or within its supply chain, the site shall ensure that adequate and documented measures are taken to safeguard the vulnerable individuals affected and remediate the situation. |  |  |
| 2.6 Management of ethical trade and responsible sourcing incidents |
|  | The site shall have a plan and system in place to manage ethical trade and responsible sourcing incidents and crises effectively. |
| Clause | Requirements | Conforms | Comments |
| 2.6.1 | The site shall have a documented ethical trade and responsible sourcing crisis management procedure and contingency plan that are capable of being actioned at any time, allowing them to report and effectively manage incidents and situations that may have a negative impact on the people affected, as well as the site’s brand or reputation. |  |  |
| 2.6.2 | Where it is deemed that a negative impact has occurred to brand or reputation, the site shall inform its certification body and customers within 24 hours. |  |  |
| 2.6.3  | The site shall test the procedure and contingency plan annually and ensure the results are recorded. |  |  |
| 2.7 Relationship with local community |
| 2.7.1 Community engagement |
|  | The site shall foster positive relationships with its local community, including individuals or groups. |
| Clause | Requirements | Conforms | Comments |
| 2.7.1.1 | The site shall have a community engagement strategy that fosters positive relationships with the local community, helping it to identify and respond to concerns about its operations. |  |  |
| 2.8 Outsourced processes |
|  | The site shall ensure that where a process step is outsourced to another site or company and/or undertaken at another site (including home workers), it does not compromise the labour standards, health and safety or basic human rights of the workers involved. |
| Clause | Requirements | Conforms | Comments |
| 2.8.1 | The site shall have a supplier approval process for all outsourced processors that it uses, which must be completed before work is undertaken. |  |  |
| 2.8.2 | The site shall ensure that it enters into formal delivery contracts with all outsourced processors. These contracts shall clearly define the business arrangements and explain the requirements of the site’s ethical trade and responsible sourcing policies. |  |  |
| 2.8.3 | As a part of the supplier approval process, the site shall monitor approved outsourced processors to ensure they maintain legal compliance and the ongoing compliance with the requirements of the site’s ethical trade and responsible sourcing policies. |  |  |

# 3 Labour standards

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| 3.1 Regular employment |
| 3.1.1 Recruitment |
|  | The site shall have a full understanding of its entire recruitment process, including its legal and/or ethical responsibilities. Where labour recruiters, employment agencies or other intermediaries are used, the site shall ensure these entities maintain compliance with national legislation and the site’s ethical trade and responsible sourcing policies. |
| Clause | Requirements | Conforms | Comments |
| 3.1.1.1 | The site shall have a fair and consistent recruitment procedure for the hiring of workers whom it recruits and directly employs. |  |  |
| 3.1.1.2 | The site shall have an approval process for all labour recruiters, employment agencies and other intermediaries that it uses to source workers whom it does not directly recruit and/or employ. |  |  |
| 3.1.1.3 | As a part of the approval process, the site shall monitor approved labour recruiters, employment agencies and other intermediaries to ensure they maintain legal compliance (including operating licences or certifications where applicable) and the ongoing compliance with the requirements of the site’s ethical trade and responsible sourcing policies. |  |  |
| 3.1.1.4 | The site shall have a list of approved labour recruiters, employment agencies and other intermediaries it uses. |  |  |
| 3.1.1.5 | The site shall ensure that approved labour recruiters, employment agencies or other intermediaries do not subcontract to third parties without the prior and written consent of the site. |  |  |
| 3.1.2 Terms and conditions |
|  | The site shall ensure that, to every extent possible, work is performed based on a recognised employment relationship and that obligations to workers under labour or social laws are not avoided through the repeated use of fixed-term or rolling contracts, labour-only contracting, subcontracting, homeworking arrangements or apprenticeship schemes where there is no real intention to impart knowledge or develop skills. |
| Clause | Requirements | Conforms | Comments |
| 3.1.2.1 | The site shall ensure that any person who is a direct employee of the business shall be recognised as an employee and not self-employed. |  |  |
| 3.1.2.2 | The site shall explain the terms and conditions of employment to its employees (before their appointment) in a language they understand, to ensure they can make an informed decision to accept or decline the job. |  |  |
| 3.1.2.3 | The site shall establish a formal agreement for each direct employee that defines the employment relationship that was discussed and agreed during the recruitment process, outlining the terms and conditions of employment. As a minimum, the following information should be included in the agreement:* employer’s name
* employee’s name, job title, place of work and start date
* hours of ordinary work
* how much and how often the worker will be paid
* holiday entitlement
* other benefits
* notice period
* information on the grievance and disciplinary procedures.
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| 3.1.2.4 | The site shall provide the formal agreement for all employees in a language and/or format that they understand. |  |  |
| 3.1.2.5 | As a part of its supplier approval process, the site shall monitor its approved labour recruiters, employment agencies or other intermediaries to ensure all agency or subcontracted workers are provided with terms and conditions of employment that meet legal requirements and the requirements of the Standard. |  |  |
| 3.2 Freely chosen employment |
| Fundamental | The site shall recognise, respect and uphold the rights of prospective workers (whether they are direct employees or workers supplied by a third party) to choose to accept an offer of employment without incurring debt or any other penalty, burden or encumbrance. |
| Clause | Requirements | Conforms | Comments |
| 3.2.1 | The site shall not require employees to pay a fee, incur any personal cost or be indebted in any way to the site to secure work. |  |  |
| 3.2.2 | The site shall require that employment agencies and other third parties do not request that workers should pay fees or incur any personal costs to secure work. |  |  |
| 3.2.3 | The site shall ensure that where loans or advances are provided to workers, they shall conform to local legislation and be governed by a written agreement. |  |  |
| 3.3 Entitlement to work |
|  | The site shall ensure that only workers with a legal right to work shall be employed. |
| Clause | Requirements | Conforms | Comments |
| 3.3.1 | Where individuals are employed either as permanent or non-permanent workers, the site shall verify their entitlement to work before they commence employment. |  |  |
| 3.3.2 | The site shall require approved labour recruiters, employment agencies or other intermediaries to provide evidence that they have verified that the workers they supply are legally entitled to work. |  |  |
| 3.4 Freedom of association and the right to collective bargaining |
|  | The site shall recognise, respect and uphold the workers’ right to freely associate and bargain collectively and shall not interfere with or discriminate against workers or their representatives. |
| Clause | Requirements | Conforms | Comments |
| 3.4.1 | The site shall facilitate the workers’ right to join (or decline to join) or form trade unions of their own choosing and to bargain collectively. |  |  |
| Clause | Requirements | Conforms | Comments |
| 3.4.2 | The site shall not discriminate against worker representatives and shall allow them access to carry out their representative functions in the workplace. |  |  |
| 3.4.3 | The site shall allow the selection of worker representatives that are freely chosen by workers through an election process, without the involvement or interference of management. The site shall record the results of any election process. |  |  |
| 3.4.4 | The site shall ensure that details of elected representatives are displayed and easily accessible to workers. |  |  |
| 3.4.5 | The site shall ensure that management takes reasonable measures to inform workers about their rights regarding freedom of association and collective bargaining. |  |  |
| 3.4.6 | Where the right to freedom of association and collective bargaining is restricted under law, the site shall facilitate and not hinder the development of parallel means for independent, free association and bargaining. |  |  |
| 3.4.7 | Management shall meet regularly to consult with the trade union or worker representative(s) on issues related to collective bargaining and grievance. |  |  |
| 3.5 Child labour |
| Fundamental | The site shall not recruit or employ children and shall effectively safeguard individuals and remedy situations if child labour is discovered, both within its own operations and within its supply chain. |
| Clause | Requirements | Conforms | Comments |
| 3.5.1 | The site shall not undertake any new recruitment of child labour and shall not employ people under the age of 15, under the minimum age for work or under the minimum age for completion of compulsory education, whichever affords the greatest protection. |  |  |
| Clause | Requirements | Conforms | Comments |
| 3.5.2 | Where labour providers, employment agencies, other intermediaries or subcontractors are used, the site shall ensure that its own child labour policy extends to the personnel employed by these third parties. |  |  |
| 3.5.3 | The site shall have a robust system to help determine the age and suitability of applicants applying to work for the site and shall inform the applicant if employment is declined because an applicant is below the minimum age for work or the basic minimum age of 15. |  |  |
| 3.5.4 | Where children are resident in workplace family accommodation with their parents, the site shall prohibit them from participating in any form of work relating to its operation. |  |  |
| 3.5.5 | If child labour is discovered, the site shall identify the root cause to ensure it does not reoccur and support the child or children to ensure they are safeguarded and able to attend and remain in education, have access to play, leisure and cultural activities, and are housed in accommodation that meets their physical and social needs until they are no longer a child. |  |  |
| 3.5.6 | The site shall develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing child labour until they are no longer a child. |  |  |
| 3.6 Young or vulnerable workers |
|  | The site shall ensure that the working conditions of young or vulnerable workers are in line with local law or relevant ILO conventions, whichever affords the higher protection. As a minimum, young or vulnerable workers should not work at night, or in conditions that expose them to physical, emotional or moral harm and should not undertake work that interferes with their education or training. |
| Clause | Requirements | Conforms | Comments |
| 3.6.1 | The site shall ensure that young workers between the ages of 15 and 18 have terms and conditions of employment that comply with national legal requirements. |  |  |
| 3.6.2 | The site shall ensure that young workers’ terms and conditions of employment are accepted and authorised by their parents or legal guardians. |  |  |
| 3.6.3 | The site shall ensure that young or vulnerable workers have access to effective grievance mechanisms. |  |  |
| 3.6.4 | The site shall ensure that young or vulnerable workers are trained on relevant health and safety issues that are related to their status. |  |  |
| 3.7 Wages |
| Fundamental | The site shall pay workers a fair wage. |
| Clause | Requirements | Conforms | Comments |
| 3.7.1 | The site shall ensure that wages – including quota or piece rate payments – and benefits paid for a standard working week shall meet the legal minimum wage rate (where available) or industry benchmark standards, whichever is higher. In any event, wages shall always be enough to meet basic needs and to provide some discretionary income. |  |  |
| 3.7.2 | Where applicable, the site shall pay workers in accordance with established collective bargaining agreements or their equivalent. |  |  |
| 3.7.3 | The site shall pay overtime at a premium and in accordance with local law or a recognised collective bargaining agreement. Such overtime payment shall be paid at least 125% above the minimum wage. |  |  |
| 3.7.4 | The site shall pay wages regularly, on time and in accordance with the terms and conditions of employment established between the employer and the worker before commencement of employment. |  |  |
| 3.7.5 | The site shall pay wages to workers that correspond to their pay period for all amounts due, including the hours worked, overtime payments, piece rate amount where applicable, and deductions. |  |  |
| Clause | Requirements | Conforms | Comments |
| 3.7.6 | The site shall ensure that for each pay period workers receive written pay slips that comply with legal requirements and summarise their wages and deductions, providing enough information for the worker to know they have received the correct pay. As a minimum, the pay slip shall contain:* information required by law
* employee’s name
* pay period and hourly pay rate
* hours worked.
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| 3.7.7 | The site shall take reasonable measures to ensure that workers understand their pay slips. |  |  |
| 3.7.8 | The site shall ensure that any deductions (statutory and non-statutory) shall conform to the requirements of applicable legislation. |  |  |
| 3.7.9 | If the site provides accommodation, any deduction made from workers’ wages shall be done in accordance with local legislation. In places where no legislation exists, the deduction shall be reasonable. |  |  |
| 3.7.10 | Where access to purchases and provisions is provided by the site, there shall be no obligation – direct or implied – placed on the worker to make use of them. Where deductions are made for purchases and provisions, they shall be supported with evidence of proof of purchase. |  |  |
| 3.7.11 | The site shall ensure that workers are entitled to and shall receive all leave allowances outlined in their terms and conditions of employment including those provided by law (statutory and non-statutory). |  |  |
| 3.8 Working hours |
|  | The site shall ensure that workers do not work excessive hours and that all working hours are accurately recorded and monitored. Where workers are asked to work overtime, this shall be voluntary, compensated at a premium and shall not be regular. |
| Clause | Requirements | Conforms | Comments |
| 3.8.1 | The site shall ensure that there are effective systems in place to accurately record the number of hours worked by each worker. |  |  |
| 3.8.2 | The site shall ensure that working hours – including the provision of rest breaks – comply with national laws, collective agreements, and the provision of clauses 3.8.3–3.8.7 (based on international labour site standards), whichever affords the greater protection for workers. |  |  |
| 3.8.3 | The site shall define ordinary working hours, excluding overtime, and ensure they do not exceed 48 hours per week. |  |  |
| 3.8.4 | The site shall ensure that all overtime shall be voluntary and used responsibly, considering the extent, frequency and hours worked by individual workers and the workforce. Overtime shall not be used regularly or to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of regular rate of pay or in line with local legislation. |  |  |
| 3.8.5 | The site shall ensure that the total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clauses 3.8.6 and 3.8.7. |  |  |
| 3.8.6 | The site shall ensure that working hours may only exceed 60 hours in any 7-day period in exceptional circumstances where it is allowed by national law, or by collective agreement freely negotiated with a workers’ site representing a significant portion of the workforce, appropriate safeguards are taken to protect workers’ health and safety and the employer can demonstrate that exceptional circumstances apply such as unexpected product peaks, accidents or emergencies. |  |  |
| 3.8.7 | The site shall ensure that workers have at least 1 day off in every 7-day period or, where allowed by national law, 2 days in every 14-day period. |  |  |
| 3.9 Discrimination |
|  | The site shall ensure that there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. |
| Clause | Requirements | Conforms | Comments |
| 3.9.1 | The site shall extend the discrimination policy (required in clause 1.1.1) to all workers including permanent, non-permanent and migrant workers, to ensure that the entire workforce is treated fairly and equally across all aspects of their employment terms and conditions. |  |  |
| 3.10 Worker records |
|  | The site shall ensure that all workers have accurate and up-to-date personnel records that are confidential to ensure that the worker’s data is protected. |
| Clause | Requirements | Conforms | Comments |
| 3.10.1 | The site shall maintain accurate and up-to-date records for each worker to establish a history of who has been employed in the past as well as the duration of their employment. |  |  |
| 3.10.2 | The site shall ensure that all worker records are stored in a secure place where the data is protected in accordance with legal requirements so that their privacy is safeguarded and records can only be accessed by authorised personnel. |  |  |
| 3.10.3 | The site shall ensure that non-permanent workers that leave and return to the same place of work within 12 months shall accrue all leave and other benefits due to them by local law. |  |  |
| 3.11 Fair discipline |
|  | The site shall ensure that discipline is applied fairly and consistently and that there is no physical or verbal abuse (or any threat thereof) and that all forms of intimidation are prohibited. |
| Clause | Requirements | Conforms | Comments |
| 3.11.1 | The site shall establish a documented disciplinary procedure explaining the steps to follow should disciplinary action be taken against a worker. |  |  |
| 3.11.2 | The site shall inform all workers so that they understand and have access to the disciplinary procedure in a language or format that they understand. |  |  |
| 3.11.3 | The site shall ensure that all managers with people management responsibility receive training on the fair application of the disciplinary procedure. |  |  |
| 3.11.4 | The site shall maintain accurate and up-to-date records of all disciplinary processes and of any hearings, findings and disciplinary actions that have been taken. |  |  |
| 3.11.5 | The site shall ensure that disciplinary actions do not include fines or other deductions, or the threat or mention thereof. |  |  |
| 3.11.6 | The site shall ensure that no threats or intimidation in any form, including bullying, physical abuse and sexual or other harassment, shall be tolerated. |  |  |

# 4 Health and safety

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| 4.1 A healthy and safe working environment |
|  | The site shall ensure that a healthy and safe workplace is provided and shall take adequate steps to prevent accidents and injury arising out of, associated with or occurring during work by minimising, as far as is reasonably practicable, hazards in the working environment. |
| Clause | Requirements | Conforms | Comments |
| 4.1.1 | The site shall regularly monitor its performance regarding health, safety and welfare in the workplace and shall establish documented clear objectives that are appropriate and specific to the occupational health and safety management system. |  |  |
| 4.2 Health and safety risk assessments |
|  | The site shall undertake risk assessments to identify hazards and understand risks in the working environment. The risk assessments shall be completed by appropriately qualified and competent personnel and reviewed regularly. The results shall be documented and communicated to management and workers. |
| Clause | Requirements | Conforms | Comments |
| 4.2.1 | The site shall ensure that risk assessments to identify hazards and understand risks in the working environment are conducted by appropriately qualified and competent personnel. |  |  |
| 4.2.2 | The site shall undertake risk assessments to identify potential hazards and risks in its operation and shall establish systems to detect, minimise, avoid or mitigate potential threats to the overall health, safety and welfare of all workers. |  |  |
| 4.2.3 | The site shall use the risk assessments to develop an action plan applicable to all workers, demonstrating that it has put in place effective measures to protect workers and prevent accidents and injuries in the workplace. |  |  |
| 4.3 Effective management of risk |
|  | The site shall operate an effective risk management system assigning overall responsibility for health and safety to a member of senior management. In addition, the site shall make available the financial, human and other resources necessary to maintain an effective system. |
| Clause | Requirements | Conforms | Comments |
| 4.3.1 | The site shall formally appoint a senior management representative responsible for the overall health and safety of workers. They will be accountable for the implementation and management of health and safety measures required by this Standard. |  |  |
| 4.3.2 | The site shall ensure that a worker is nominated by the workforce and formally appointed to act as the health and safety representative on their behalf, to support legal compliance regarding health and safety issues. |  |  |
| 4.4 Worker training |
|  | The site shall ensure that workers receive periodic and documented health and safety training and supporting information. Such training shall be repeated regularly for existing workers, as well as delivered to new or reassigned workers. In all cases, workers shall be paid to attend training during regular working hours and at no cost to them. |
| Clause | Requirements | Conforms | Comments |
| 4.4.1 | The site shall deliver a basic health and safety induction to workers when they start work or when they are reassigned, covering all the significant risks identified in the risk assessments. The training shall be documented. |  |  |
| 4.4.2 | The site shall repeat the delivery of health and safety training to existing workersperiodically, to refresh their understanding of how health and safety relates to their jobs. The training shall be documented. |  |  |
| 4.4.3 | The site shall make information about health and safety issues available to workers in suitable formats that promote understanding. |  |  |
| 4.4.4 | The site shall ensure that the appointed health and safety representatives shall receive training that explains how to perform their legal duties and what they are. |  |  |
| 4.5 Personal protective equipment |
|  | The site shall ensure that workers who require personal protective equipment (PPE) identified through risk assessment are provided with the correct equipment that will minimise the risk and allow them to fulfil their jobs without harm or injury. |
| Clause | Requirements | Conforms | Comments |
| 4.5.1 | The site shall provide workers with PPE at no cost to the worker, that is fit for purpose and maintained in a good state of repair. |  |  |
| 4.5.2 | The site shall ensure that workers required to use PPE are trained to use the equipment correctly. |  |  |
| 4.5.3 | The site shall conduct regular and documented checks of workers required to use PPE, to ensure they are using the equipment provided for them. |  |  |
| 4.5.4 | The site shall provide facilities for washing and storage of PPE. |  |  |
| 4.6 Medical surveillance and assistance |
|  | Where identified through risk assessment, the site shall provide medical screening and assistance (in line with legal requirements) to workers who are exposed to substances hazardous to health, to ensure that the risk of serious injury or the development of long-term health conditions or injury is minimised. |
| Clause | Requirements | Conforms | Comments |
| 4.6.1 | The site shall provide medical screening and assistance (in line with legal requirements)to workers who are regularly exposed to occupational hazards where continuous exposure increases the risk of injury or disease, as identified through risk assessment. |  |  |
| 4.6.2 | The site shall provide precautionary screening for all workers who come into regular contact with hazardous substances and materials, as identified through risk assessments. |  |  |
| 4.7 Control of substances hazardous to health |
|  | The site shall ensure that workers who handle substances that are hazardous to health have access to procedures and information designed to protect their health, safety and well-being, in line with legal requirements. |
| Clause | Requirements | Conforms | Comments |
| 4.7.1 | The site shall have health and safety procedures (informed by the risk assessments) that explain how chemicals, hazardous substances and materials should be handled, stored and disposed of, to ensure that workers’ exposure to risk is minimised and to meet legal requirements. |  |  |
| 4.7.2 | The site shall have periodic and documented health and safety training for workers who handle chemicals, hazardous substances and materials to ensure that their exposure to risk is minimised. |  |  |
| 4.7.3 | The site shall ensure that all substances hazardous to health are stored safely, with the relevant and up-to-date materials safety data sheets or equivalent, which shall be available in areas of storage and use, according to local health and safety law or regulations where these exist. |  |  |
| 4.7.4 | The site shall ensure that a documented inventory is kept of all substances and materials hazardous to health stored and used on site. This shall be regularly updated in line with legal requirements. |  |  |
| 4.8 Accident and emergency preparedness |
|  | The site shall ensure that there are appropriate procedures as well as all necessary equipment and facilities to deal with accidents and emergencies in the workplace, such as chemical spills. |
| Clause | Requirements | Conforms | Comments |
| 4.8.1  | The site shall have a documented accident and emergency procedure which shall be displayed in relevant areas that is readily accessible to workers, together with the contact details for the relevant personnel. |  |  |
| Clause | Requirements | Conforms | Comments |
| 4.8.2  | The site shall train all relevant workers on the accident and emergency procedure to make sure they understand what to do in the event of an accident or emergency. |  |  |
| 4.8.3  | The site shall ensure that all accidents, near-misses and emergencies are recorded and in all cases, a written incident report is completed and the cause investigated and identified. |  |  |
| 4.8.4  | The site shall ensure that appropriate signs are displayed in areas where hazards have been identified. |  |  |
| 4.8.5  | The site shall ensure that all emergency lighting, fire exits, escape routes, firefighting equipment, fire and smoke alarms and carbon monoxide detectors are clearly labelled according to industry standards and legal requirements. |  |  |
| 4.8.6  | The site shall provide appropriate warning systems such as smoke or carbon monoxide detectors, alarms and firefighting equipment in the workplace. |  |  |
| 4.8.7  | Based on risk assessment recommendations and the building type, the site shall regularly test its warning systems and firefighting equipment to ensure it is in good working order. |  |  |
| 4.8.8  | The site shall ensure that fire exits are always kept clear to allow for swift and efficient escape in case of an emergency. |  |  |
| 4.8.9  | The site shall ensure that all workers know that they are free to remove themselves from any situation that exposes them to imminent danger without seeking permission and without fear of repercussions for doing so. |  |  |
| 4.8.10  | The site shall test all accident and emergency procedures annually, in accordance with the requirements of local legislation. |  |  |
| 4.9 First aid and access to medical care |
|  | The site shall ensure that the provision of first-aid facilities, equipment and supplies, as well as access to medical care, meets the minimum legal requirements. |
| Clause | Requirements | Conforms | Comments |
| 4.9.1 | The site shall provide well-stocked, well-maintained first-aid supplies in the workplace that meet minimum legal requirements. |  |  |
| 4.9.2 | The site shall ensure there are an appropriate number of trained first-aiders in the workplace. |  |  |
| 4.9.3 | The site shall ensure there are trained members of staff on site in case medical care is required, in line with legal requirements. |  |  |
| 4.10 Facilities |
| 4.10.1 Buildings and equipment |
|  | The site shall ensure that all facilities, including buildings and equipment provided in the workplace are in a good state of repair, regularly maintained and pose no threat to the physical health and safety of workers. |
| Clause | Requirements | Conforms | Comments |
| 4.10.1.1 | The site shall ensure it can provide evidence that machinery and equipment is maintained and in a good state of repair. |  |  |
| 4.10.1.2 | The site shall maintain buildings so that they pose no threat to the safety, health and well- being of workers. |  |  |
| 4.10.1.3 | The site shall provide adequate lighting in the workplace. |  |  |
| 4.10.1.4 | The site shall ensure that any regulated equipment is maintained and regularly serviced by an approved contractor. |  |  |
| 4.10.1.5 | The site shall make sure that where transport for workers is provided, it shall meet minimum safety standards prescribed by legislation. |  |  |
| 4.10.1.6 | The site shall ensure that electrical installations are locked so that only authorised personnel have access and that appropriate warning signs are displayed. |  |  |
| 4.10.2 Worker accommodation |
|  | The site shall ensure that all accommodation provided for workers meets their basic needs. |
| Clause | Requirements | Conforms | Comments |
| 4.10.2.1 | The site shall provide warning systems and other regulated equipment in worker accommodation that are regularly serviced by an approved contractor. |  |  |
| 4.10.2.2 | The site shall ensure there are sufficient and unobstructed fire exits in all accommodation provided. |  |  |
| 4.10.2.3 | The site shall provide adequate lighting in worker accommodation. |  |  |
| 4.10.2.4 | The site shall maintain accommodation buildings so that they are in a good state of repair. |  |  |
| 4.10.2.5 | The site shall ensure that all electrical equipment provided in worker accommodation is maintained and regularly serviced. |  |  |
| 4.10.2.6 | The site shall ensure that the accommodation meets the requirements of the relevant regulations (where applicable) and shall be clearly and distinctly separated from any buildings used for production and/or storage. |  |  |
| 4.10.2.7 | The site shall ensure that worker accommodation is clean, safe and meets the basic needs of its workers. |  |  |
| 4.11 Worker welfare |
|  | The site shall ensure that workers are provided with the necessary facilities to enable them to perform their duties in an environment that affords them dignity and respect. |
| Clause | Requirements | Conforms | Comments |
| 4.11.1 | The site shall ensure that without exception, workers shall have access to toilet and changing facilities in or near their place of work. |  |  |
| 4.11.2 | The site shall ensure access to clean and sufficient drinking water in or near workers’ place of work. Drinking water shall conform to the national standards established by the relevant authorities and if applicable, there should be sanitary facilities for food preparation, storage and rest areas. |  |  |

# 5 Respect for human rights

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| 5.1 UN guiding principles on business and human rights |
| Fundamental | The site shall respect and avoid infringing the human rights of others, either directly within its own operations or indirectly through entities with whom it does business. It should seek to remediate and, wherever possible, eliminate adverse human rights impacts where they are identified. |
| Clause | Requirements | Conforms | Comments |
| 5.1.1 | The site shall appoint a senior management representative responsible for overseeing human rights issues in all aspects of its operation. |  |  |
| 5.1.2 | The site shall undertake a human rights impact assessment to identify areas where there may be direct or indirect adverse human rights impacts, or the potential for them to occur, in their operations. |  |  |
| 5.1.3 | The site shall monitor the effectiveness of its human rights policy (required in clause 1.1.1) through periodically reviewing the impact assessment and measuring the positive and negative impact on stakeholders. |  |  |
| 5.1.4 | Where the site identifies or is made aware of direct or indirect adverse human rights impacts, or the potential for them to occur, either caused by its operations or where its operations are a contributing factor, it shall provide for or contribute to the management, remediation, minimisation or elimination of those impacts through legitimate processes. |  |  |
| 5.1.5 | In all instances where the site has identified direct or indirect adverse human rights impacts, or the potential for them to occur – caused in part or in full by the site’s operations or its suppliers – it shall take adequate accountability measures that are documented in an accountability report which is communicated externally, to show how the site has responded to mitigate and/or minimise these impacts. |  |  |
| 5.1.6 | The site shall cascade its ethical trade and responsible sourcing policies (required in clause 1.1.1) and risk assessment practices to its direct and indirect suppliers through their supply chains and work with them to identify, manage and mitigate identified risks. |  |  |
| 5.2 Forced and bonded labour |
| Fundamental | The site shall ensure that workers without exception shall have the right to work without subjugation, without any form of financial or other penalty and shall be free to terminate their employment without penalty. |
| Clause | Requirements | Conforms | Comments |
| 5.2.1 | The site shall not permit forced, bonded or involuntary prison labour. |  |  |
| 5.2.2 | The site shall establish effective recruitment procedures that ensure workers’ rights in this regard are respected and upheld. |  |  |
| 5.2.3 | The site shall not require workers to lodge deposits or their identity papers with anyone and they shall be free to leave their employment after an agreed notice period. |  |  |
| 5.2.4 | Where the site provides facilities for the safekeeping of personal belongings, there shall be evidence that the use of such facilities is made at the request of the owner of the belongings and that access shall be granted to the owner upon request. |  |  |
| 5.2.5 | The site shall not restrict workers from moving freely or leaving the workplace at the end of their shift/outside of working hours nor shall they be obligated to stay at the workplace or in any other accommodation owned or provided by the workplace. |  |  |
| 5.3 Human trafficking |
| Fundamental | The site shall ensure that there are adequate procedures to effectively identify, quantify and, where necessary, address the risk of human trafficking during the recruitment process, particularly where this involves the displacement of people from their normal place or country of residence, in line with relevant legislation. |
| Clause | Requirements | Conforms | Comments |
| 5.3.1 | The site shall not tolerate human trafficking. However, if cases are identified then the site shall have a procedure to ensure the safeguarding of the individual(s) involved and it shall be reported to the relevant country/national authorities in line with relevant legislation. |  |  |
| 5.4 Land use rights |
|  | The site shall avoid the encroachment of its operations on the lives of the community in which it operates, not displacing people or communities and demonstrating that it has the legal permissions and licences to operate. |
| Clause | Requirements | Conforms | Comments |
| 5.4.1 | The site shall demonstrate that it is legally entitled to occupy the land and is in possession of the necessary permits, deeds and other statutory documentation associated with operating a business. |  |  |

# 6 Corporate governance

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| 6.1 Business ethics and integrity |
| Fundamental | The site shall commit to the highest standards of ethical conduct and integrity within its operations, ensuring that all workers acting on its behalf conduct their activities with honesty, transparency and professionalism, in compliance with legal requirements. |
| Clause | Requirements | Conforms | Comments |
| 6.1.1 | The site shall demonstrate that it understands local and national legislation relating to the prevention of bribery, corruption and fraud. |  |  |
| 6.1.2 | The site shall formally appoint a senior management representative who is responsible for overseeing the implementation of the anti-bribery, anti-corruption and fraud prevention policy (required in clause 1.1.1) across all aspects of its operation. |  |  |
| 6.1.3 | The site shall conduct a risk assessment of its operations to identify areas where it may be vulnerable to incidents of bribery, corruption and fraudulent business practice. |  |  |
| 6.1.4 | The site shall put in place anti-bribery, anti-corruption and fraud prevention proceduresto prevent and minimise incidents of bribery, corruption and fraudulent business practices across its operations. |  |  |
| 6.1.5 | The site shall ensure that all relevant management and workers, particularly those in job roles carrying a higher risk of bribery, corruption and fraud (as identified in the human rights impact assessment), receive training on its procedures to raise their understanding of the issues and deter incidents. |  |  |
| 6.1.6 | The site shall report any incidents of bribery, corruption or fraud to the certification body and the relevant authorities, co-operating with them to act against individuals or organisations committing the offence. |  |  |
| 6.1.7 | The site shall document any incidents of bribery, corruption or fraud in its operations, recording details of the action taken to remediate any damage caused by the incident. |  |  |
| 6.1.8 | The site shall ensure that all new contracts with its direct suppliers, labour recruiters, employment agencies or other intermediaries include requirements relating to anti-bribery, anti-corruption and fraud prevention. |  |  |
| 6.1.9 | The site shall regularly review the effectiveness of its anti-bribery, anti-corruption and fraud prevention procedures and make documented changes where required. |  |  |
| 6.2 Information security |
|  | The site shall be committed to the highest standards of information security to protect the confidentiality and integrity of all business-related data in compliance with legal requirements. |
| Clause | Requirements | Conforms | Comments |
| 6.2.1 | The site shall demonstrate that it understands local and national legislation relating to information security and data protection. |  |  |
| 6.2.2 | The site shall formally appoint a senior management representative who is responsible for overseeing the implementation of the information security policy (required in clause 1.1.1) across all aspects of its operation. |  |  |
| 6.2.3 | The site shall conduct a risk assessment of its operations to identify areas where it may be vulnerable to data breaches or digital crime. |  |  |
| 6.2.4 | The site shall put in place information management procedures to ensure that all information relating to its operations is secure and that it has taken steps to minimise data breaches or digital crime. |  |  |
| 6.2.5 | The site shall ensure that all staff receive training on its information security procedures to raise their understanding of the issues and deter data breaches or digital crime. |  |  |
| Clause | Requirements | Conforms | Comments |
| 6.2.6 | The site shall report any data breaches or digital crime to the relevant authorities, co- operating with them to act against individuals or organisations committing the offence. |  |  |
| 6.2.7 | The site shall document any data breaches or digital crime, recording details of the action taken to remediate any damage caused by the incident. |  |  |
| 6.2.8 | The site shall ensure that all new contracts with its suppliers, labour recruiters, employment agencies, other intermediaries and subcontractors include requirements relating to information security. |  |  |
| 6.2.9 | The site shall regularly review the effectiveness of its information security procedures and make documented changes where required. |  |  |