

Employer Self-Assessment Tool

Tool to understand an employer's management systems and practices vis a vis the Ethical Charter

Introduction

In 2018, the Boards of Directors of our two industry associations, Produce Marketing Association and United Fresh Produce Association, launched the Ethical Charter on Responsible Labor Practices (Charter). The Charter contains guiding principles and values intended to set a reference framework for responsible labor practices throughout the global fresh produce and floral supply chains.

To support its adoption across the industry, our associations are developing a set of **reference tools** for communication of best practices and to provide a common interpretation of responsible labor standards and their implementation. This Employer Self-Assessment Tool (ESAT) is the first of these reference tools.

The ESAT asks a company to collect information on each of the thirteen principles contained in the Charter, focusing on either compliance with applicable laws and regulations, or an organization's activities or controls/management systems for implementation of the Charter's principles.

The ESAT is a valuable tool for any supply chain responsible labor practices program. It:

- Promotes awareness of the principles contained in the Charter;
- Provides a tool to communicate what is currently being done in the industry to promote, reinforce and improve responsible labor practices;
- Encourages self-reflection and responsibility for learning, helping employers evaluate and consequently manage responsible labor policies, practices, and performance;
- Provides a means for suppliers to provide information regarding their management systems and practices to their customers or other stakeholders;
- Reduces the burden of multiple questionnaires, to avoid duplication and improve efficiency, in efforts to make reasoned judgments about conformance to the Charter; and
- Enable buying companies around the world to work towards mutual recognition of audits.

To use this tool, employers may wish to develop a strategy to consider how to best gather the data needed. It is helpful to consult a variety of resources (e.g., company policies, wage slips, time records, health & safety records, etc.) and colleagues (e.g., health and safety officers, human resource managers, field supervisors, etc.). Workers are also valuable resource and it



may be impossible to gather a clear picture of responsible labor practices without their input. Interviewing workers will be particularly important in the case vulnerable workers are employed, such as migrant workers, either directly or through a third-party labor contractor.

This ESAT is not an exhaustive list of the Charter's principles and values; rather, the Measurement Criteria is the proper reference document for this purpose. Note that this document is not intended to be, nor should it be construed as, legal guidance, given that specific legal requirements will differ per jurisdiction. Moreover, the presentation of questions in this document pertaining to specific employer practices does not necessarily imply an endorsement of either those practices or related codes of conduct; each company will need to develop its own management systems unique to its needs.

The ESAT is not a means to an end, but rather a tool to enable a spirit of cooperation, learning and transparency across the floral and produce supply chains about labor conditions, policies, and practices, as permitted by law.

Ethical Charter for Responsible Labor Practices

We believe that everyone deserves to be treated with dignity and respect. We are committed to respecting workers' rights and protecting their safety and health, while recognizing the cultural and legal differences found throughout the industry and the world. As an industry, we care about the wellness, respect and safety of the workers who help us offer the wide variety of fresh fruit, vegetables and flowers consumers enjoy.

The guiding values and principles set out in this Ethical Charter provide a framework for coordinated, focused action across the industry. When growers, labor agencies, packers, distributors, foodservice operators, marketers and retailers of fresh produce and flowers work together to assure ethical working standards, everyone in the supply chain benefits and consumer confidence in our products is enhanced. Responsible labor practices are the right thing to do and our success as an industry depends on it.

Our Values

- We believe that work in the fresh produce and floral industries should provide economic opportunity for all involved. Employers, workers, their families, and communities should benefit financially as a result.
- We respect, value, and encourage mutually beneficial efforts and a positive relationship between the employer and the employee, and intend to support efforts that strengthen that relationship.
- We operate in a spirit of cooperation, learning and transparency with our workers, trading partners and other stakeholders.
- We support transparency in our supply chains about labor conditions, policies, and practices, as permitted by law, with the aim of improving the work environment and giving workers opportunities for success.
- We seek to inspire continual learning and progress across the produce and floral supply chain, through education and an exchange of ideas and best practices in implementation of these principles.
- We believe in accountability throughout the supply chain and among all stakeholders to deliver our shared vision of responsible labor practices. These values can only flourish because of our day-to-day behavior and actions, with each of us working within our individual area of responsibility and strengths.

Our Guiding Principles

Respect for Laws at Work

Legal Compliance

Employers shall adhere to the law and regulations as established by the applicable jurisdiction.

Occupational Safety & Health

Workers shall be provided a safe, hygienic, and sanitary environment at both work-related sites, and at any housing mandated or provided by the employer. Employers shall adopt reasonable measures to identify hazards and control occupational risk of injury and illness. Examples of such safeguards may include, but are not limited to, the following: industrial hygiene and sanitation programs; injury and illness prevention; emergency preparedness and response; chemical safety; equipment and machine safety; ergonomics; ventilation and lighting.

Wages & Benefits

Workers shall be paid for all work performed. Employers must comply with all applicable legal requirements regarding legal eligibility to work, benefits and wages (including wages for overtime premiums and/or minimum compensation for any payment arrangement based on productivity). Employers must provide leave and benefits as required by law. Payments will be made in accordance with any applicable contract terms and pay calculation shall be transparent to workers.

Working Hours

Employers manage working hours in accordance with applicable laws, recognizing that agricultural labor needs vary by season, crop and task, and workers are sometimes needed for shorter or longer time periods than a standard workweek. Employers provide rest

periods if needed to support a safe and healthy workplace. Employers inform workers about their expectations regarding hours of work and gain their agreement at time of hiring.

Respect for Professional Conduct

Communication and Worker Protections

Direct communication between management and their employees is the most effective way of resolving workplace issues and concerns. All workers should have both the right and responsibility to voice questions, report in good faith any improper or wrongful activity, or discuss opportunities and/or grievances. To do so, there should be a fair, transparent, and accessible channel of communication to provide input to management and to resolve workplace issues. Employers should encourage timely disclosure of concerns and shall prohibit retaliation against anyone who, in good faith, reports concerns.

Ethical Recruitment

Employers shall recruit workers ethically. Abusive, deceptive, fraudulent, or corrupt practices are unacceptable at any stage of the recruitment and selection process. No worker should pay for a job; employers shall bear the costs of recruitment and placement. If third-party labor contractors are utilized, appropriate due diligence is performed to ensure their commitment to uphold the Ethical Charter.

Management Systems and Continuous Improvement

Employers commit to integrating sound management systems (such as policies, processes, education and training, documentation, communication, and feedback channels) that sustain and demonstrate compliance with applicable labor, employment, occupational health and safety laws governing the employer. Employers should look to these systems to continuously improve performance against compliance objectives.

Responsible Purchasing Practices

Companies purchasing commercial quantities of produce and floral products understand and seek to mitigate the impact of their planning and purchasing practices on the commitments in this Ethical Charter.

Respect for Human Rights

Employment is Freely Chosen

Employers must not tolerate modern day slavery – such as forced or compulsory labor, debt bondage, involuntary prison labor or the trafficking of persons. Employers commit to a work environment where employment is freely chosen and not performed under threat, coercion, force, or menace of penalty.

Freedom of Association

Employers follow applicable law regarding freedom of association and collective bargaining and workers' equal right to refrain from such activity.

Humane Treatment and Non-Harassment

Every worker deserves to be treated with dignity and respect and should not be subject to physical, sexual, psychological, or verbal harassment or abuse, coercion, or the threat of such conduct. Employers address the need to prevent sexual harassment with education, communication and disciplinary procedures that demonstrate that such behavior will not be tolerated.

Non-Discrimination

Equal employment opportunities are respected, including respect for all individuals. Workers deserve a workplace free from unlawful discrimination in any form, where employment decisions are based only on the requirements of the job.

Protection of Children and Young Workers

Respecting and supporting children's well-being requires employers to actively safeguard children's interests, preventing harm at the workplace. Young people who can legally work also desire and deserve economic opportunities but need age-appropriate work and appropriate supervision. Employers commit to prevent children and/or young workers from performing work that is mentally, psychologically, physically, or socially dangerous or harmful, or that hinders compulsory education. Employers do not hire anyone below the legal age of employment or younger than 15 where no minimum employment age exists.

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Self-Assessment Tool

Management Systems

Commitment, Strategy, Policies & Procedures

1. Has the owner or most senior management level (such as CEO or Board of Directors) **committed** to responsible labor practices?
- No Yes
 Planned

Please explain:

2. Do you have a **dedicated senior manager** in charge of ensuring compliance with all national, provincial, and other local laws and regulations pertaining to the workplace across all your facilities?
- No Yes
 Planned
3. Do you have a documented **strategy** for addressing labor practices and driving the implementation of sound human resources practices?
- No Yes
 Planned

Please explain:

- 3.1. If yes, is this strategy based on an assessment of risks and opportunities related to workers' rights, safety, and welfare, and their causes?
- No Yes
 Planned

Please explain:

N/A

4. Do you have **operational management systems** to ensure the delivery of the strategy and achievement of stated targets?
- No Yes
 Planned

Please explain:

5. Please explain how you have allocated sufficient **resources** to implement policies and procedures.

6. For each Charter Principle, please indicate if you have **written policies** defining your approach and **corresponding procedures** its implementation and oversight: No Yes

Principle	Policy			Procedure		
Legal compliance	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Occupational health & safety	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Wages & benefits	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Working hours	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Communication & worker protections	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Ethical recruitment	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Employment is freely chosen	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Freedom of association	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Humane treatment & non-harassment	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Non-discrimination	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
Protection of children and young workers	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned

7. For each item below, please indicate if it is within **the scope** of your policy & procedure:

Principle	Aspect	Within Scope?			
R e s p e c t i f i c a	Occupational Health & Safety	Legal compliance in safety & health	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Risk mitigation and industrial hygiene practices	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Employer-provided housing	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Emergency preparedness and response	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
	Wages & Benefits	Minimum wage legal compliance	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Wage legal compliance with piece rate	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Direct and timely payment in legal tender	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Legal withholdings and deductions	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Payment for work-related activities	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
	Working Hours	Legal benefits	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Legal compliance in working hours	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned

W s a t W o r k		Mitigating health & safety impacts from hours	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Advanced communication/overtime requirements	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Transparency of hours	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
P r o f e s s i o n a l C o n d u c t	Communication & Worker Protections	Communication channels	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Dispute resolution	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Non-retaliation	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
	Ethical Recruitment	Transparency of terms of employment	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Employer pays principle	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Ethical conduct and transparency in recruitment	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Responsible labor contractors	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
R e s p e c t f o r H u m a n R i g h t s	Employment is Freely Chosen	Voluntary labor	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Debt mitigation	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Freedom of movement	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Respect decision to terminate employment	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
	Freedom of Association	Legal compliance	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Protection of workers' choice	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
	Humane Treatment	Prohibition against harassment and abuse	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Harassment prevention	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Commitment to investigate and act	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
	Non-Discrimination	Legal compliance	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Prohibited inquiries and medical screening	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Equal opportunity	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
	Protection of Children & Young Workers	Minimum age for employment	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Young workers protection	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned
		Removal of children	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Planned

Training

8. Do person(s) responsible for implementing responsible labor practices at your site(s) and/or facilities receive appropriate **training** necessary to conduct their activities? No Yes Planned

Please explain:

- 8.1. If yes, do you have records to track the training, answering who, what, when? No Yes N/A

Monitoring Performance

9. How often does the management of your company **review management systems** to identify continuous improvement opportunities? Never Annually Periodically

10. Do you **evaluate practices** to learn what is working well or poorly and why? Do you monitor your performance? No Yes

If yes:

N/A

- 10.1. Are workers involved in the evaluation? No Yes
Please explain:

10.2. What was the date of the last management review:

10.3. Please provide an overview of the results of this review:

10.4. Please list areas that are currently undergoing improvement, if applicable:

N/A

11. Do you have a main **system of documentation** that enables you to monitor and oversee all labor employment, and health and safety practices in the workplace? No Yes Partially

12. Do you have a program to **engage in continuous improvement** of processes and social compliance? No Yes
 Planned

Please explain:

- 12.1. If yes, do you also analyze areas for root causes of non-compliance or other problems to reduce the risk of reoccurrence? No Yes
 Planned
 N/A
Please explain:

Communication & Worker Protections

Communication Channels

13. Do you have methods to create an **informed workplace**? No Yes
 Planned

If yes: N/A

- 13.1. Do these methods inform workers of company policies and procedures? No Yes
 13.2. Do these methods inform workers of their duties, obligations & rights? No Yes
 13.3. Are a variety of methods used, to take into consideration the composition of the workforce and the complexity of the message? No Yes
 13.4. Are workers made aware of the methods and programs they can use for communication, consultation, or engagement? No Yes

14. Does the facility have written policies related to employee involvement? No Yes
 Planned

15. Do you have management systems for worker consultation and engagement? No Yes
 Planned

Please explain:

- 15.1. If yes, which of the following **communication or consultation methods** are deployed, whereby management and workers can discuss issues of interest to workers, and elicit their feedback: No Yes
 N/A
- Regular meetings
 - Worker assemblies
 - Regular dormitory meetings
 - Suggestion boxes
 - Worker-management committees
 - Worker surveys
 - Other _____

- 15.2. If yes, do the methods deployed take into consideration the cultural and language differences of the workforce when promoting the understanding or, and the ability to participate? No Yes
 N/A
- Please explain:*

- 15.3. Does the facility provide training to all employees on employee involvement policies and procedures? No Yes
 Planned

Dispute Resolution

16. Does the company have a **mechanism for resolving workplace complaints**, should they occur? No Yes
 Planned

If yes: N/A

- 16.1. Can all workers use it? No Yes

- 16.2. Which of the following does it include?
- Reporting processes for submitting complaints, disputes, or issues of concern
 - Processes for their review and determination
 - Processes for reporting back to parties involved
 - Processes to protect against retaliation for good faith use or participation in mechanism

- 16.3. Does the company **encourage workers to report** violations or issues of concern? No Yes
 N/A

Please explain:

17. Do you require labor contractors to have their own similar mechanisms? No Yes Planned

Please explain:

Employment is Freely Chosen

Voluntary Labor

18. Do you have a **policy** that prohibits forced labor? No Yes
- 18.1. If yes, please indicate what is prohibited under the policy: No Yes N/A
- Forced labor
 - Involuntary prison labor
 - Bonded labor
 - Debt bondage
 - Indentured labor
 - Trafficking of persons
 - Other _____

19. Do you use **prison labor**? No Yes
- If yes, please explain:*

Debt Mitigation

20. Are there any **deposits or collateral** associated with obtaining work? No Yes
21. Is there any use of **labor in exchange** for debt repayment? No Yes
22. Do you **charge workers** for any training or education required for the job? No Yes
23. Are **pay advances** allowed? No Yes

23.1. If yes, please describe any limits in amounts, if any: N/A

24. Are **loans** available to workers from the employer? No Yes
 Planned

If yes: N/A

24.1. Are wages deductions for repayments disclosed and agreed to in writing prior to any deduction? No Yes

24.2. Are repayment terms such that deductions are within legal limits, and ensure sufficient income for necessities? No Yes

24.3. Are workers required to pay back the loan before they can terminate employment? No Yes

24.4. Please describe for what loans are offered, and the repayment terms: N/A

25. Is **housing, food, or daily transportation** provided by the employer? No Yes
 Planned

If Yes: N/A

25.1. Is their use voluntary? No Yes

25.2. Are their costs reasonable? No Yes

25.3. *Please explain any "yes" answers:*

Freedom of Movement

26. Are any **restrictions of movement** inside the place of production or any employer-provided facilities? No Yes

26.1. If yes, are restrictions limited to legitimate safety, security, or business concerns? No Yes
 N/A

26.2. Are all workers free to leave the employment site during nonworking hours or at the end of their shift? (including workers who live on-site) No Yes

26.3. Are employees allowed to leave the facility during work hours: for any reason; for medical appointments or in cases of emergency; or during break, rest time or after working hours? No Yes

26.4. If housing is provided, are residents able to leave when they wish (even in the case where curfews may be used)? No Yes
 N/A

26.5. Are employees allowed access to restroom breaks, drinking water and medical facilities? No Yes

27. Is **surveillance** used? No Yes

If Yes: N/A

27.1. Is it narrowly tailored in time, place, and manner? No Yes

27.2. Are workers notified of all monitoring No Yes

28. Are workers able to **access drinking water, sanitary facilities, and medical facilities** without suffering financial penalty? No Yes

Please explain any restrictions or how this freedom is assured:

29. Do you hold or safeguard **workers' documents** (ID cards, or passports, or residency papers)? No Yes
 N/A

If Yes: N/A

29.1. If yes, is it a legal requirement for you to do so? No Yes

29.2. Do employees provide these documents of their own consent and is there a system through which they have free and easy access? No Yes

29.3. If housing is provided by the employer, is secure and accessible storage provided to safeguard personal documents and other valuables? No Yes
 N/A

30. Are **migrant workers free to return to their home country or domicile** during periods of annual or personal leave, without having to pay a deposit, or without being subject to threats of termination or retaliation? No Yes

Respect Workers' Decision to End Their Employment

31. Are all workers **free to leave their employment**?

- Yes, at any time
- Yes, when completing contract
- Yes, when worked off his/her debt
- Yes, upon giving notice If yes, describe notice period:

32. Are workers responsible for any **fees, or are there any wage deductions**, if they terminate the job earlier than the contracted work period? No Yes

If yes, please explain:

33. Are there any cases where you **withhold any payments or entitlements** upon termination? No Yes

If yes, please explain:

34. Are all **final wages paid**, upon termination, within the standard pay period detailed in the terms of employment? No Yes

If no, please explain:

35. Do you arrange and pay for the **repatriation of foreign migrant workers** at the end of their contracts? No Yes
 N/A

Please explain:

35.1. Do you repatriate foreign migrant workers if you terminate his/her contract (for any reason other than documented gross misconduct) before the contract end date? No Yes
 N/A

Ethical Recruitment

Transparency of Terms of Employment

36. Does the facility have written **policies** related to ethical employee recruitment and hiring? No Yes
 Planned
37. Do you obtain **workers' informed consent** to terms of employment without deception, threat, or coercion? No Yes
38. Are the **main terms of employment** provided to workers? No Yes
 Planned
 N/A
- If Yes:
- 38.1. Are they provided in writing? No Yes
- 38.2. Are they explained verbally to enable review and understanding? No Yes
- 38.3. What information about the job does the company provide at the time of recruitment? At the time of contract signing? Upon entrance to the job? N/A
- 38.4. Do you have a signed term of employment for every directly employed worker? No Yes
 Planned
- 38.5. Does the facility provide trainings on recruitment and hiring policies and procedures to individuals responsible for hiring and recruitment? No Yes
 Planned
- 38.5.1. Does the facility provide new employees with orientation trainings to assist their understanding of all workplace policies and procedures? No Yes
 Planned
- 38.5.2. Does the facility communicate workplace policies and procedures to new employees? (i.e. by providing a handbook or equivalent) No Yes
 Planned

Employer Pays Principle

39. Have you **committed** to the employer pays principle? No Yes
 Planned
- 39.1. Do you have a clear **forward-facing policy** that specifies the range of costs to be met by workers vs employers, and any expectations and timelines for reimbursement? No Yes
 Planned

39.2. Please explain how this commitment and/or policy is implemented: N/A

40. Do workers **pay any fees** at any point in the process of applying or getting hired, or for keeping their jobs? No Yes Not Sure

40.1. If fees are paid, please list all fee amounts, what they were for, and to whom they were paid. N/A

40.2. If you answer no, have you validated with workers that they are not paying any fees of any type, whether before or during employment? No Yes N/A
Please explain:

40.3. If workers pay fees, are they reimbursed? No Yes Planned N/A
Please explain:

40.4. In the last 12 months, have there been circumstances in which the facility has had to use **deportation, cancellation of visas or reporting to the authorities** as a disciplinary measure? No Yes
If yes, please explain:

Ethical Conduct & Transparent Practices in Recruitment

41. How do you ensure that all **advertising** for applicants is done in a manner that discloses the true nature of the work? N/A

Please explain:

42. How do you ensure that when **recruiting with international or foreign migrant workers** that recruitment is done in

accordance with both sending and receiving laws or regulations?

Please explain:

43. Is **contract substitution** prohibited?

No Yes
 N/A

Please explain:

Responsible Labor Contractors

44. Do you have an ongoing method of **monitoring the practices of your labor contractor**?

No Yes
 Planned
 N/A

Please explain:

45. Have you **validated the license**, if applicable, of the labor contractor and have you checked for any prior legal violations by the labor contractor?

No Yes
 N/A

46. What **remedial action** do you take when a labor contractor rejects, or fails to cooperate in, due diligence, or is unwilling to remedy a violation of labor law or human rights?

N/A

Freedom of Association

Legal Compliance

47. Do you **comply with all applicable laws and regulations** regarding freedom of association and collective bargaining?

No Yes

47.1. Please describe how you ensure compliance all applicable laws and regulations?

47.2. In the last 12 months, have there been any violations of the law related to freedom of association or collective bargaining? No Yes

If yes, please explain:

Humane Treatment

Prohibition against Harassment & Abuse

48. Do you **comply with all applicable laws and regulations** regarding harassment and abuse? No Yes

48.1. Please describe how you ensure compliance all applicable laws and regulations?

48.2. In the last 12 months, have there been any violations of the law related to harassment and abuse? No Yes

If yes, please explain:

49. Does your company have defined **rules against harassment & abuse**? No Yes Planned

49.1. In terms of **scope**, which of the following is prohibited by your rules? N/A

- Verbal harassment or abuse
- Physical harassment or abuse
- Visual harassment or abuse
- Psychological harassment or abuse
- Sexual harassment or abuse
- Unlawful harassment or retaliation

- Penalties for acts of harassment and/or abuse
- Worker recourse in case of violations
- Other _____

Prohibition against Harassment & Abuse

50. Do you take **reasonable care to prevent** harassment or abuse? No Yes

51. Do you provide workers with detailed **communications on their rights and protections** regarding harassment? No Yes
 Planned

51.1. If yes, please explain the methods used to ensure that workers both receive and understand it? N/A

52. Does your company have any **educational efforts** on sexual harassment? No Yes
 Planned

Please explain:

52.1. Do you **train** managers, supervisors, and crew leaders on employee treatment? No Yes
 Planned

52.2. If yes, when is this training provided? N/A

52.3. If yes, which of the following is included in the training:

- Procedures for bringing, investigating, and responding to a complaint
- Recognizing unacceptable behavior
- Preventing unacceptable behaviors
- Appropriate or effective responses
- Other _____

Commitment to Investigate & Take Action

53. Do you have a formal, documented **grievance procedure**? No Yes
 Planned

- 53.1. If yes, which of the following is within the scope of your procedure? N/A
- Procedures for reporting harassment or abuse complaints
 - Procedures for the investigation of complaints in a fair and thorough manner
 - Procedures for responding to complaints
 - The designation of a qualified individual for oversight and/or implementation
 - Clear roles, responsibilities
 - Immediate and effective corrective action, in the event of confirmed occurrence
 - Procedures to assess root cause of problems, and possible preventive responses
 - Non-retaliation protection for making a complaint or assisting in its investigation
 - System to discipline supervisors, managers and employees who engage in any form of harassment or abuse?
 - Other _____

- 53.2. If yes, please describe the efforts taken to identify lessons for improving the mechanism and preventing future grievances and harms raised through the mechanism. N/A

54. In the last 12 months, have there been any **cases of harassment or abuse?** No Yes

- 54.1. Any of violence against employees or where employees were threatened? No Yes
- 54.2. Any cases of physical harassment or abuse at the facility? No Yes
- 54.3. Any cases of verbal harassment or abuse at the facility? No Yes
- 54.4. Any cases of psychological or mental harassment at the facility? No Yes
- 54.5. Any cases of sexual abuse at the facility? No Yes

If yes, please explain:

Non-Discrimination

Non-Discrimination Compliance

55. Do you **comply with all applicable laws and regulations** regarding nondiscrimination? No Yes

55.1. In the last 12 months, have there been any **cases of discrimination** brought against the company due to a legally protected class? No Yes

If yes, please explain:

56. How do you ensure that any decisions during hiring, employment, or termination, are never based on a **personal characteristic** of the worker? N/A

57. How do you ensure there is **no difference in pay** for workers performing substantially similar work with a comparable composite of skill, effort and responsibility, absent bona-fide factors recognized by law? N/A

Prohibited Inquiries and Medical Testing

58. Is **medical testing** required as a condition of being hired or promoted? No Yes

58.1. If yes, please explain what is tested, and whether it is legally required for the position being contracted: N/A

59. Do you ever ask females about **pregnancy status** during hiring or during the course of employment? No Yes

59.1. If yes, please explain the business reason for this:

N/A

Equal Opportunity

60. How do you ensure all persons of the same skill level have an **equal opportunity for training and advancement**?

N/A

61. How do you ensure all that the allocation of tasks, access to training, access to opportunities, working hours, pay, overtime, benefits, health care, union rights, collective bargaining agreements, disciplinary measures, and termination policies, are **both transparency and based on the principle of equal treatment**?

N/A

62. Are **supervisors trained** in avoiding disciplinary practices?

No Yes
 Planned

If yes, please explain:

63. Do you comply with all applicable **legal work requirements for pregnant, post-partum and lactating women**?

No Yes

Please explain:

64. In the last 12 months, have employees who are **pregnant or on parental leave** been terminated or resigned? No Yes

If yes, please explain:

Occupational Safety & Health

Legal Compliance

65. Does the facility **comply with all applicable laws and regulations** related to health and safety? No Yes

65.1. Please describe how you ensure compliance to all applicable health & safety laws and regulations?

65.2. In the last 12 months, have there been any violations of the law related to occupational health and safety? No Yes

If yes, please explain:

65.3. Are building certificates and permits available, as required by law? No Yes

Policies and Procedures

66. Does the company have **health and safety policies** that are relevant to the production being performed, to identify and guard and against hazards and prevent injury or illness at work? No In Place Partial Planned

66.1. If yes, which of the following is within the scope of your policy? N/A

	Principle	Policy		Procedure	
	Industrial hygiene and sanitation	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	Chemical safety	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	Injury and illness prevention	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	Emergency preparedness and response	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	Equipment and machine safety	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	Ergonomics	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes

	Ventilation	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	Lighting	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	Structural and building safety	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	Other: _____	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes

66.2. Please explain what is missing:

N/A

67. Does the company have **health and safety procedures** that are relevant to the production being performed, to identify and guard against hazards and prevent injury or illness at work?

- No
 In Place
 Partial
 Planned

67.1. If yes, please tick off which subjects are included in the procedures:

N/A

- Accident and injuries are documented and investigation
- Access to clean drinking water during working hours (unlimited access)
- Building evacuation procedures (where applicable)
- Chemical handling and pesticide-related procedures
- Canteen safety & hygiene
- Communication channels between workers and management on health and safety matters
- Contractor safety
- Documentation and investigation of accidents, injuries
- Dormitory safety & hygiene
- Electrical safety
- Emergency contact information for local authorities
- Emergency plans, response, and communication procedures
- First aid, medical
- Food handling rules (where applicable)
- General work environment (e.g. ventilation, cleanliness, lighting, noise, etc.)
- Hearing conservation
- Heat stress and/or sunstroke signs, symptoms, and prevention
- Hygiene: toilets, handwashing, drinking water

- Machine maintenance, licensing, safety devices and inspections
- Material safety data sheets in native language of persons handling chemicals
- Mitigation and prevention of repetitive motion injury
- Physically demanding work
- Preventing or controlling exposures that endanger life, health, or physical condition
- Procedures for inclement weather
- Provision, maintenance and use of appropriate personal protective equipment
- Rules about working when ill
- Rules for smoking, eating, chewing tobacco, spitting
- Safe handling of electricity
- Safe use of electrical equipment
- Structural safety of buildings (where applicable)
- Use of jewelry, watches, or other personal effects
- Vehicle operation and safety procedures
- Other: _____

67.2. Please explain any missing elements: N/A

68. Are all workers (including temporary workers) **trained** on health, safety, and hygiene? No Yes
 Planned

68.1. If yes, how often does this occur: N/A

68.2. If yes, please select which documentation is available: N/A

- Training schedule
- Training curriculum samples
- Records of the names of all personnel trained and the dates they were trained
- Photos of training
- Other _____

Risk Mitigation & Industrial Hygiene Practices

69. Does your company have a **health & safety risk assessment process** to identify, prioritize and mitigate the potential OHS risks associated with your operations and activities? No
 In Place
 Partial
 Planned



Please explain:

69.1. If applicable, please specify any high-risk areas identified through the risk assessment process. N/A

69.2. Do you implement action plans for all risk areas identified?
If yes, please provide an example: No Yes
 N/A

69.3. When was the last health and safety risk assessment carried out? N/A

69.4. Is your occupational health & safety management system certified to an ISO or equivalent standard? No Yes
 N/A

Employer-Provided Housing

70. Is **sleeping in the field** prohibited? No

Yes

71. Is **housing secured, provided, or mandated**

in connection with the work? No

Yes

Planned

Please explain:

72. Does the housing meet all **applicable laws and regulations** for occupancy, structural, health, sanitation, and safety? No

Yes

73. Do housing conditions and infrastructure ensure **sanitation, decency, privacy, and security**?

Please explain:

74. Are measures in place to prevent **overcrowding** in housing and sleeping arrangements?

- No
 Yes
 Planned

Please explain:

Emergency Preparedness and Response

75. Do you have an **emergency response plan** to prepare for, and respond to, fire, natural disaster or accidents or other emergencies?

- No Yes
 Planned

Please explain:

75.1. Which staff person is responsible for implementation of the plan?

- N/A

75.2. Is first aid available at the work site?

- No Yes
 Planned

Please explain:

75.3. Is emergency contact for local authorities accessible and understandable?

- No Yes
 Planned

Please explain:

75.4. Do workers have a means to contact authorities in the event of an emergency?

- No
 Yes
 Planned

Please explain:

Protection of Children and Young Workers

Minimum Age for Employment

76. Does the facility have **written policies** related to the recruitment and hiring of child labor/underage labor?

- No Yes
 Planned

77. Is there a **minimum wage of employment** requirement in the country, region, or locality where your facility operates? No Yes
- If yes, what is it?
78. What is the **date of birth of the youngest worker**, and when did he or she start working in the company?
79. Are all employees currently **at or above the applicable legal minimum** working age? No Yes
 N/A there is no minimum age legally
- 79.1. If there is no established minimum age for employment under law, are all employees currently at least fifteen years old? No Yes
 N/A
80. Do you have a robust system for checking and **verifying the ages** of workers, and that he/she is legally allowed to work? No Yes
 Planned
- 80.1. If yes, what documents do you use to confirm the age of applicants? N/A
- ID card Birth certificate School certificate
 Church certificate School certificate Dental or doctor certificate
 Driver's license Passport Social security document
 Other: _____
- 80.2. Do you keep copies of proof of **age documentation** in worker's personnel files? No
 Yes
 Planned
- 80.3. Do you **check with labor brokers** you are using to supply labor that the company has copies of ID's of their workforce? No
 Yes
 Planned
 N/A
- Please explain:*

Young Workers Protection

81. Does the facility have **written policies** related to recruitment and employment practices of young workers? No Yes
 Planned
82. Does the facility have **written procedures** related to recruitment and employment practices of young workers? No Yes
 Planned
- 82.1. Do you have an up to date **risk assessment** that covers young workers and the potential areas of risk in the workplace? No Yes
 Planned

83. Do you have any **young workers** (i.e. below the age of 18), or do you have any apprentices in the employment site? No Yes

If yes: N/A

83.1. Does the facility meet all legal requirements pertaining to the employment of young workers? No Yes

83.2. Do you have a program to comply with any regulatory restrictions or requirements applicable for those under the age of 18? No Yes

83.3. Does the facility monitor the working hours of all young workers separately? No Yes

83.4. Do you make sure that young workers are exempt from hours of work that conflict with their ability to attend compulsory education? No Yes

83.5. Do you make sure that your workers are exempt from overtime work? No Yes

83.6. Do you make sure that your workers are exempt from night work? No Yes

83.7. Do you make sure that young workers are exempt from hazardous work? No Yes

83.8. Does the facility maintain parental permission for young workers to work in the facility, as legally required? No Yes

83.9. Does the facility arrange health checks for all young workers, as legally required? No Yes

83.10. Please describe your systems for the protection of young workers or why you do not need one:

Removal of Children

84. What is your facility's practice when it comes to **children visiting the production areas**? (i.e. children that are not employees, but are just visiting)

85. Are non-employed children provided from **access to production, harvest**, or other work areas? No Yes

86. Do **childcare facilities**, if made available at work, overlap with worksite areas where work is performed? No Yes N/A

86.1. If you do not provide child care facilities, do you prohibit your employees from bringing their children to work? No Yes N/A

87. Have you ever had **child workers on your employment site**? No Yes

87.1. If yes, what did you do? N/A

88. Do you have a formal **procedure for remedying** any confirmed instances of child labor? No Yes Planned

Please describe your systems for remediation of child labor, or why you do not need one:

88.1. If yes, does it include removal from the workplace immediately, and include a process for keeping the child safe until he/she is handed over to a legal custodian? No Yes Planned

Please explain:

Responsible Purchasing Practices

89. Do you **communicate or engage with your customers** on how their planning and purchasing practices impact your commitment to responsible labor practices? No
 Yes
 Planned

Please explain:

89.1. If yes, in which of the following areas: N/A

- Alignment of financial terms with responsible labor practices
- Accuracy and timeliness of planning/forecasting
- Accuracy and timeliness of tech packs
- Adequacy of lead time provided
- Conflicting demands between business and compliance needs
- Hit rates on products developed for customers
- Paying bills on time and in full
- Visibility into ordering plans
- Other: _____
- Other: _____

90. Do you receive **incentives from customers** for responsible labor standards or practices? No
 Yes
 Planned

90.1. If yes, which incentives: N/A

- Consistent minimum volume of production per month
- Customer paid training for skill or capacity development
- Larger volume
- Less social compliance audits (timing or amount)
- More favorable mix of products
- Option to set higher minimum order level
- Premium pricing
- Supplier award or recognition program
- Other: _____

91. Do you **communicate to your suppliers** any expectations regarding responsible labor practices? No
 Yes
 Planned

91.1. If yes, please describe which types of suppliers receive this communication, in what form and by what methods: N/A

Wages & Benefits

Minimum Wage Legal Compliance & Wage Legal Compliance with Piece Rate

92. Does the facility **comply with all applicable laws and regulations** related to wages and benefits? No Yes

92.1. Please describe how you ensure compliance to all applicable wages & benefits laws and regulations?

92.2. In the last 12 months, have there been any violations of the law related to wages or benefits? No Yes

If yes, please explain:

93. Is there a legal **minimum wage** requirement in the country, region, or locality where your facility operates? No
 Yes

If yes: N/A

93.1. Please enter the minimum wage in U.S. dollars per hour:

- 93.2. Do any workers at your facility receive less than the minimum wage? No Yes
- 93.3. Is the minimum wage paid for a standard work week? No Yes
- 93.4. Is productivity-based pay compared to the applicable minimum wage rate to ensure legal compliance? No Yes

94. How much does **the lowest paid worker earn** in a standard working hour per hour, for each of the following:

- 94.1. Permanent worker?
- 94.2. Temporary worker?
- 94.3. Piece rate worker?
- 94.4. Subcontractor?
- 94.5. Homeworker?

95. Do you pay workers for overtime hours in addition to regular working hours? No Yes
 N/A

95.1. If yes, what is the rate of **overtime pay** compared to regular time pay? (Select the best answer which matches your lowest rate of overtime paid.) N/A

- Less than regular time
- Equal to regular time
- More than regular time, but less than time-and-a-half
- Equal to, or between time-and-a-half, and double time
- Equal to double-time or more
- Other: _____

96. Is the appropriate **premium rate** applied for overtime? No
 Yes
 N/A

Please explain:

Direct, Timely Payment in Legal Tender & Wage Statements

97. Are wages **paid directly to workers** and not to a third party, by you or a qualified payroll service? No Yes

98. In which of the following **ways are workers paid:**

- Cash Bank check Bank transfer
- Money order Direct deposit
- Voucher to the company store Pre-paid credit card
- Other: _____

99. How **often** do workers receive their wages?

Please specify the frequency and exact date, if any:

99.1. Does any wage period exceed 30 days? No Yes

99.2. In the last 12 months, have there been circumstances under which wages were delayed or withheld from employees? No Yes

If yes, please explain:

Legal Withholdings & Deductions

100. Do you make any **deductions** from workers' pay? No Yes

If yes: N/A

100.1. Are deductions ever made as a disciplinary measure? No Yes

100.2. Are all deductions and withholdings legally compliant? No Yes

100.3. After deductions are made, do any workers receive less than the legally applicable minimum wage? No Yes

100.4. Please provide details of:

Legally required deductions:

Other deductions:

101. Do you make any **government required withholdings**? No Yes N/A

If yes: N/A

101.1. Do withhold for taxes? No Yes

101.2. Do withhold for social security? No Yes

101.3. Do withhold for social insurance? No Yes

101.4. Are government required withholdings correctly calculated? No Yes

101.5. Are government required withholdings submitted to applicable authority? No Yes

101.6. Are withholdings submitted within the legally required timeframe? No Yes

101.7. Are withholdings documented properly? No Yes

Please explain:

102. Do all your workers receive **clear information** in the local or appropriate language(s) about how their actual wages are calculated? No Yes Planned

Please explain:

103. Do workers receive an understandable **pay statement**? No Yes
 Planned

103.1. Please indicate which of the following your wage statement includes: N/A

- Dates of the pay period
- Name and address of employer
- Name and address of employee
- Total number of regular hours worked
- Total number of overtime hours
- Gross wages (all earnings before taxes or deductions)
- Net wages (after taxes and deductions),
- Rates of pay and the number of hours at each rate
- Amounts for piece rate bonuses or allowances
- Other: _____

Payments for Work Related Activity

104. Is all **mandatory time at the work site paid** to workers, including training or meetings? No Yes
 Planned

105. Are workers paid for any time that they are required to be on the employer's premises or on duty at the prescribed work location? No Yes
 N/A

105.1. Which of the following are covered?

- Mandatory meetings
- Mandatory trainings
- Time spent traveling from one work site to another during the workday and after arrival at first work site
- Time spent traveling to and from a new assignment away from a usually prescribed work location
- Other: _____

Legal Benefits

106. Are all legally required benefits given? No Yes

106.1. If yes, please explain what is provided:

- 106.2. Do you provide any **social benefits** to the workers (e.g. health insurance, pension fund, child care, education, accommodation etc.)? No Yes
- 106.3. Are all legally required paid leaves given? No Yes
- 106.4. Are all legally required paid rest or meal periods given? No Yes
- 106.5. Are all legally required paid leaves given? No Yes
- 106.6. Are all legally required paid bonuses given? No Yes

Working Hours

Legal Compliance in Working Hours

107. Does the facility **comply with all applicable laws and regulations** related to hours of work? No Yes
- 107.1. Related to maximum hours workers can be required to work? No Yes
- 107.2. Related to young workers' hours of work? No Yes
- 107.3. Recording working time? No Yes
- 107.4. Time record keeping? No Yes
- 107.5. Periods of leave? No Yes
- 107.6. Rest days? No Yes
- 107.7. Holidays? No Yes
- 107.8. Rest periods? No Yes
- 107.9. Meal intervals? No Yes

Please describe how you ensure compliance to all applicable hours of work laws and regulations?

- 107.10. In the last 12 months, have there been any violations of the law related to hours of work? No Yes

If yes, please explain:

108. Are there **any hours of work limits** (daily, weekly, monthly, or annually) defined by either local law or regulation or collective bargaining agreement? No Yes
- If yes: N/A
- 108.1. In the last 12 months, are all regular working hours (daily, weekly, monthly, or annually) for all employees within allowable limits under applicable law or agreement? No Yes
- 108.2. In the last 12 months, are all overtime working hours (daily, weekly, monthly, or annually) for all employees within allowable limits under applicable law or agreement? No Yes

- 108.3. Are any exceptions to this maximum allowed?

If yes, please explain:

109. What are the **typical or average hours of work**?

- 109.1. Standard work week?
- 109.2. Average number of weekly overtime hours per person, per week?
- 109.3. Maximum hours workers work per day in peak season?
- 109.4. Maximum hours workers work per week in peak season?

Mitigating Impact on Health & Safety from Working Hours

110. Does the company **analyze the impact of overtime** or extended working hours on the risk of occupational injuries and illnesses?

- No Yes
 Planned

If yes, please explain:

111. What strategies does the company have in place to **prevent work injuries**?

Advanced Communication of Overtime Hours

112. Is **overtime compulsory**, or a condition of employment?

- No Yes

112.1. If so, are **workers informed** of this policy at the beginning of their employment?

- No Yes

Please explain:

Transparency of Hours

113. Does the company have a **time keeping system** for the accurate and complete tracking and reporting of work and leave time, which enables accurate calculation of pay?

- No Yes
 Planned

113.1. How are working hours **recorded** (regular & overtime) daily for each worker?

- N/A. I do not record working hours
- Attendance lists

- Employee documented records
- Punch / time cards
- Electronic recording system
- Other: _____

113.2. How does the time recording system used make hours of work (including overtime) transparent to the employee and the company?