

RBA Validated Assessment Program (VAP) Operations Manual Revision 7.0.0 – January 2021

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

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

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

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

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SECTION A INTRODUCTION

1. INTRODUCTION

This Audit Operations Manual describes how Responsible Business Alliance Validated Audits (VA) are conducted and how the RBA Validated Assessment Program (VAP) is managed.

The purpose of the manual is to:

- Communicate the objectives, scope, process and interpretive guidance for the VAP to individuals responsible for assuring that audits are conducted and that findings are appropriately addressed. This includes:
 - Auditors (internal and third party)
 - Member Companies' staff responsible for supplier auditing and interfacing with suppliers
 - Supplier relationship managers
 - Auditee management staff
 - RBA Staff
 - Audit Program Management (APM)
 - Quality Management (QM)
- Ensure that appropriate information is provided to auditees.
- Provide a consistent approach to the audits.
- Provide a basis for regularly evaluating auditors against established performance criteria and improving the program.

1.1. Service Level and Quality Statement for VAP

The RBA is committed to the improvement of conditions throughout the supply chains of its members. A key component of this commitment is a high quality VAP.

The following service and quality standards apply for RBA Validated Audits (VA):

- A default independent, experienced and approved fourth party provides quality management review of audits.
- The RBA may offer an in-house RBA Quality Management service alternative for audits, where requested
- The program utilizes leading practices from different industry sectors.
- Audits are performed by individually qualified auditors from reputable and screened audit firms.
- The use of standardized RBA audit protocols and templates.

- The APM provides ongoing guidance to auditors, members, auditees and their customers on the audit program.
- The APM provides ongoing guidance to auditors and auditees, during a Live Audit regarding audit specific questions, audit results and evaluation of RBA Corrective Action Plan (CAP) for Priority findings. A Live Audit is the period between the opening meeting of the on-site audit and the release of the final audit report in the RBA-ONLINE system.
- Feedback mechanisms are available to address concerns about the performance of the VAP.
- Feedback on the audit process and auditors is tracked, analyzed and used to improve the performance of each audit firm and to adjust the program, if needed.
- Contracting, scheduling and performance updates are made on a regular basis.
- A chargeable QM-Managed Corrective Action Plan (QM-CAP) service is available to help companies manage the CAP process for findings other than priority findings, i.e. Major, Minor and Risk of Non-conformance.
- Reports are distributed to auditees and authorized Member Companies, as well as to the RBA membership and public in aggregate form.

1.2. Supporting Documents

This document should be used in conjunction with RBA tools and guidance documents, including the RBA Definitions and Definition of Fees, available on the RBA Website.

2. RBA VAP OBJECTIVES

The goal of the VAP is to measure and foster improvement in corporate social responsibility performance and build capability within the supply base.

RBA audits produce in-depth evaluations of the social, ethical, occupational health and safety and environmental performance of suppliers as measured against the audit criteria. The audit criteria are based on the RBA Code of Conduct.

The VAP is part of an overall supplier engagement model: the process of assessing and improving labor, health and safety, environmental, and ethical practices in the supply chain. It is an audit utilizing RBA Approved Auditors, RBA developed audit processes and protocols, as well as an RBA-vetted quality review by either the fourth party QM or the RBA Quality Management for audits where fourth-party review is not required.

The RBA VAP has been reviewed by legal counsel and is in line with US anti-trust and EU anti-competition regulation.

A summary of the RBA Supplier Engagement Model is provided in Figure 1.

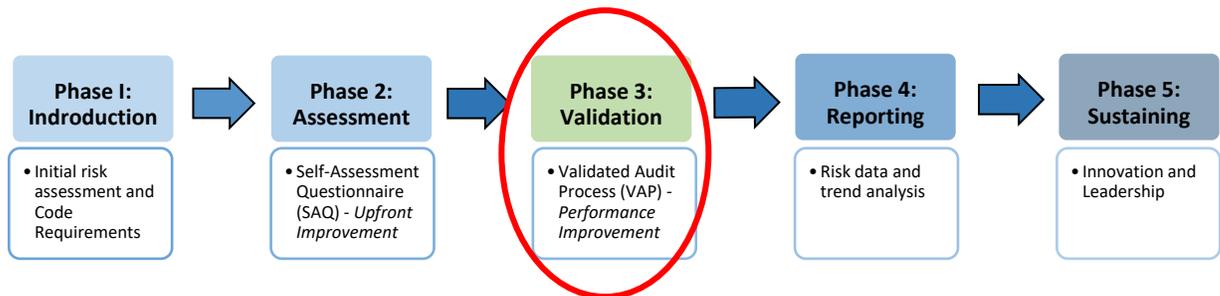


Figure 1 Supplier Engagement Model - Process Framework

The objectives of the VAP are to:

- Encourage broad adoption of Corporate Social Responsibility (CSR) leading practices by all companies and suppliers.
- Reinforce the RBA CSR expectations with companies and suppliers and ensure companies and suppliers are working toward conformance.
- Verify conformance with the RBA Audit Criteria. (AC)
- Identify opportunities for improvement in auditee CSR practices, performance and management systems.
- Provide companies with objective information to determine whether CSR expectations are being met at auditee facilities.

- Provide companies with an objective evaluation of CSR performance at auditee facilities.
- Enable companies and suppliers to focus efforts where the maximum positive difference can be made.

3. ROLES AND RESPONSIBILITIES

There are different organizations and individuals who have responsibilities regarding the VAP.

3.1. RBA Staff

RBA Staff is responsible for VAP oversight, including:

- Providing guidance and direction to the QM and VA Program.
- Managing the RBA Code of Conduct review and revision process.
- Managing associated work groups, stakeholders, Member Companies, and others who have an interest in the VAP.
- Managing the finances associated with the VAP.
- Updating all program tools and documents.
- Providing and maintaining the data system that allows customers and suppliers to share VAR.
- Reporting program metrics and analysis to RBA and relevant RBA working groups
- Developing appropriate training programs for VAP users and Auditors.

3.2. Audit Program Management (APM)

The Audit Program Management (APM) is an RBA process which is responsible for coordinating VAP activities. These responsibilities include:

- Managing Audit Firm contracts
- Managing Audit Firm performance
- Approving Audit Firms and Auditors, including ensuring Auditors have the required work experience, auditing skills, receive the proper training, and appropriate certification to conduct RBA audits
 - Maintain RBA Approved firms and their Auditor list.
- Determining scope and duration for each VA.
- Tender and allocating VA's to Audit Firms.
- Directing Auditees to the "Audit Preparation for Suppliers" document and other information, as necessary, to prepare for the VA.
- Providing Audit Firms with relevant documents to facilitate VA planning (if not in RBA-Online).

- Provide help desk support for Live Audits
- Ensuring the end to end VA process timeline is followed
- Reporting all priority non-conformances identified during the audit to Member Companies identified by the Auditee in attachment B (Attachment B Companies).
- Obtaining and reviewing feedback from Auditee management after a VA.
- Reviewing VAR to ensure quality and consistency globally with RBA criteria.
- Managing a continuous improvement model that includes a closed-loop process incorporating feedback, driving improvement in the supply chain.
- Implementing other VAP projects as necessary.

3.3. Quality Management (QM)

Quality Management (QM) is a process and service, responsible for coordinating VAP activities during a Live Audit.

These responsibilities include:

- Verifying that findings and ratings meet RBA criteria.
- Managing guidance, issues and escalations during a Live Audit from Auditors and Auditees during an audit.
- Coordinating VAR finalization with Auditors and Auditees using RBA as an escalation point
- Reviewing and incorporating relevant auditee feedback in the VAR.
- Reviewing draft VARs, to ensure quality and consistency globally with RBA criteria.
- Measuring Auditors and Audit Firm's performance, and consolidating this information with RBA senior management for review with the Audit Firms
- Releasing the final VAR in RBA-Online
- Implementing other special projects as requested by RBA.

3.4. Audit Firms

Audit Firms ensure the Audit (VA, CMA or AMA) is conducted in accordance with the expectations defined in this manual. They communicate with the APM to increase the overall consistency and quality of VA (this is not the case in a CMA or AMA). Additionally, Audit Firms must complete and submit Audit Reports (AR, reports for a VA, CMA or AMA) on time.

Audit Firms must assign competent Auditors who act in an ethical and responsible manner. Audit Firms must confirm that Auditors conducting Audits have received the required training and have the proper experience to conduct Audits. All Auditors must be on the RBA Approved Auditor list.

Audit firms must coordinate with the APM to schedule the VAP audits.

For more information about audit firm approval and requirements, see the RBA Auditor Guidebook located at:

<http://www.responsiblebusiness.org/media/docs/RBAAuditorGuidebook.pdf>

3.5. Auditors

Audit Firms assign Auditors to conduct the Audit. All Auditors must be on the RBA Approved Auditor list. Auditors are responsible for conducting the Audit. This includes work pre-, during and post - Audit.

For more information about auditor approval and requirements, see the RBA Auditor Guidebook located at:

<http://www.responsiblebusiness.org/media/docs/RBAAuditorGuidebook.pdf>

3.5.1. Auditor Responsibilities

Auditors are responsible for ensuring that they conduct the Audit in accordance with the most current Audit Protocols (AP) outlined in this manual.

Auditor responsibilities include:

- Ability to conduct the Audits at Auditee.
- Understand and apply the contents of this Operations Manual (VAP OM), RBA Code of Conduct and AP, including:
 - Audit preparation, including submitting an audit agenda to the APM at least 1-week prior to the start of the audit
 - Audit management

- Audit report completion
- Understand and apply applicable national, regional and local regulatory requirements.
- Understand and apply member Companies' requirements (if added to standard VA scope by APM at request of a Member Company)
- Participate in the opening, closing and other necessary meetings.
- Prepare findings, including complete descriptions of supporting evidence, for all assigned Audit Criteria (AC), using the AP.
- Act in an honest and ethical manner.
- Escalate any Priority non-conformance, as required by the RBA.
- Gather and save all field notes and examine evidence (documents, photos, etc.) upon completion of the AR, and where required, upload to RBA-Online. Note this includes notes developed as part of worker and management interviews and the working hours template.

3.5.2. Audit Team Members

All Auditors participating in Audits must be "RBA Approved." There are three auditor roles:

- Lead Auditor
- Auditor
- Provisional Auditor

Individuals are approved as Lead Auditors for Labor & Ethics and EHS separately. For each approval (Labor & Ethics and EHS), the individual must have the competencies, experience and/or education, and training required. An individual may receive approval for either Labor & Ethics or EHS or may receive approval for both Labor & Ethics and EHS.

Contact the APM: vap@responsiblebusiness.org for more information.

The Audit Team must consist of a minimum of two Auditors (except for some closure audits). Other Auditors may observe the audit; however, they may not be counted towards fulfilling the required person-days for the audit. Non-approved auditors in attendance are required to follow the RBA auditor standards regarding professional and ethical behavior and must not compromise the Audit process. Only one auditor under training may observe the audit at any one time or audit.

The APM approves the auditors and manages the RBA Approved Auditor List, ensuring they meet the established requirements.

For more information, contact the APM: vap@responsiblebusiness.org.

For more information on the Forced Labor Audit role, see the RBA Auditor Guidebook available

<http://www.responsiblebusiness.org/media/docs/RBAAuditorGuidebook.pdf>

4. AUDIT CRITERIA

The Audit uses the AC in the AP.

Closure audits utilize the criteria used in the Initial Audit; exceptions require APM approval.

Fundamental to the AC is compliance with local regulations, and legal non-compliances.

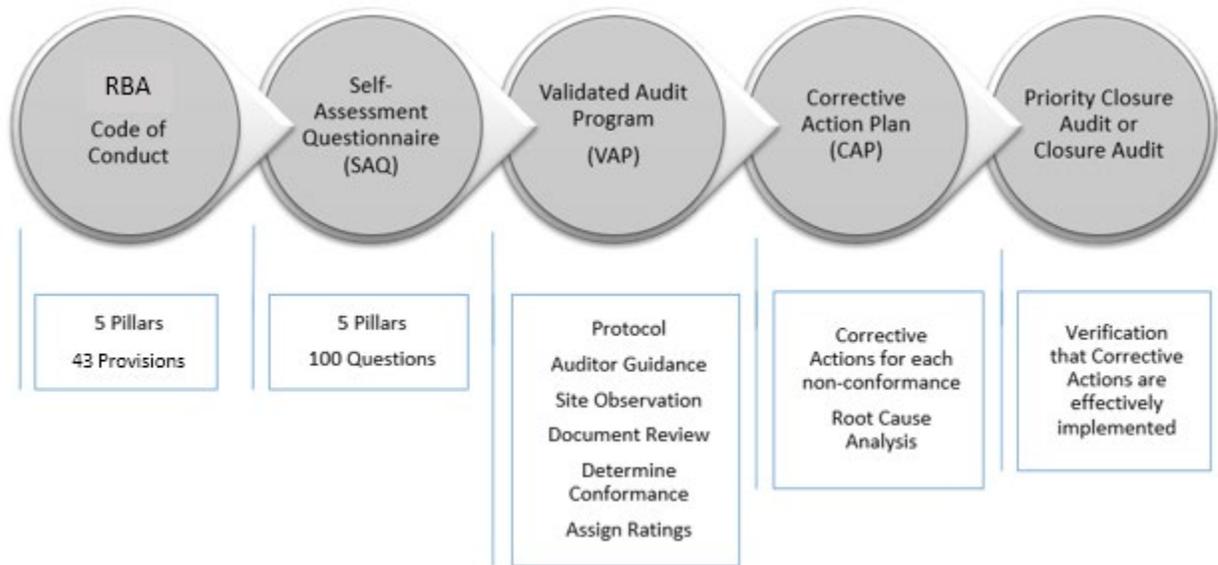


Figure 2 Components of the VAP

SECTION B PRE-AUDIT

1. AUDIT SCHEDULING

1.1. Initial Audits

Initial Audit can be scheduled at any time the auditee is ready to do so. The time to schedule an audit varies. Audits may be scheduled up to 9 months in advance.

Note - It is the Auditee's responsibility to begin the scheduling process.

For more information, contact the APM: vap@responsiblebusiness.org

1.2. Priority Audits

A Priority and/or Closure Audit(s) and/ or CAP must occur within RBA specified time frames in this manual, to demonstrate closure of any findings identified in the Initial Audit. For members these should be per the Membership Compliance Guidelines.

Priority Audits are required if Priority non-conformances are noted during the Initial Audit. The scheduling process is started by the APM as the Priority non-conformances are confirmed by the QM. Priority Audits are scheduled by the APM in accordance with the RBA VAP Timelines.

Priority Audits utilize the AC and AP used in the Initial Audit; exceptions require APM approval.

Steps to schedule a Priority Audit, auditees:

1. The QM confirms the validity of priority finding and alert the APM
2. The APM initiates the Priority Audit based on the VAP timelines for closure, soliciting auditors for the preferred audit date

1.3. Closure Audits

Closure audits are not conducted until three months after evidence of closure of the finding in the previous Audit is submitted.

If the Closure Audit is requested after 18 months from the Initial Audit, it is recommended that a Renewal Audit be conducted rather than a Closure Audit.

Closure Audits utilize the AC and AP used in the Initial Audit;

It is the auditee's responsibility to begin the scheduling process for Closure Audits.

For more information, contact the APM: vap@responsiblebusiness.org

2. AUDITOR SELECTION

The APM assigns an Audit Firm to each VA.

2.1. Initial Audits

All Audit Firms with expertise local to the Auditee are available for selection by the APM.

The APM selects the Audit Firm, and the Audit Firm assigns the Auditors to conduct the VA. The Audit Team must meet the requirements noted in the RBA Auditor Guidebook.

Audit assignment is determined by Audit Firm performance. Performance measures include:

- Audit quality:
 - Accuracy
 - Professionalism
 - Timeliness
- Availability
- Cost

2.2. Priority Audits

When Priority Audits are required, if viable, the Audit Firm which conducted the Initial Audit will be assigned to conduct the Priority Audit. Exceptions to this policy may arise when:

- The Audit Firm is not available during the time window required to conduct the audit.
- There are ethical issues, or potential ethical issues, with the Auditor or Audit Firm.

- There are extenuating circumstances, as determined by the APM, which require a different Audit Firm (for example, a highly technical issue that requires an Audit Firm with a specific skill set or knowledge base).

If a different Audit Firm is needed to conduct a Priority Audit than the Audit Firm which conducted the Initial Audit, the selection process follows the same selection process as for an Initial Audit.

2.3. Closure Audits

If the Closure Audit occurs within 6 months of the Initial Audit, the APM assigns the Audit Firm which conducted the Initial Audit to conduct the Closure Audit.

Exceptions to this policy may arise when:

- The Audit Firm is not available during the time window required to conduct the audit.
- There are ethical issues, or potential ethical issues, with the Auditor or Audit Firm.
- There are extenuating circumstances, as determined by the APM, which require a different Audit Firm (for example, a highly technical issue that requires an Audit Firm with a specific skill set or knowledge base).

If a different Audit Firm is needed to conduct a Priority Audit than the Audit Firm which conducted the Initial Audit, the selection process follows the same selection process as for an Initial Audit.

If the Closure Audit occurs after 6 months of the Initial Audit, the auditor selection is the same as for Initial Audits.

3. PREPARATION FOR THE AUDIT

Audits require preparation by the Auditors and the Auditee. A successful Audit is an Audit which accurately reports the conformance performance of the Auditee to the RBA Code of Conduct. This requires an understanding of the VAP by both the Auditor and Auditee.

3.1. Auditee Preparation

In advance of the Audit, the Auditee should prepare its location, management team and staff for the Audit.

3.1.1. RBA VAP Overview

The Audit is generally a multi-day event with multiple Auditors. The exact number of person-days and number of auditors conducting the audit is determined by the APM, based on the size, location, number of in-scope workers and scope of operations.

The AC are based on the RBA Code of Conduct and local legal requirements. The criteria cover five main areas:

- Labor
- Health & Safety
- Environmental
- Ethics
- Management Systems for Labor, Health & Safety, Environmental, and Ethics

The Audit includes:

- Site observations
- Reviews of records, programs, procedures, and policies
- Interviews with management and workers

3.1.2. Auditee Preparation Requirements

Prior to the Audit, the auditee must:

- Complete the Audit scoping document or the Self-Assessment Questionnaire (SAQ). (the audit scoping document can be used for a VA costing, however an SAQ is needed prior to the start of the VA)
- Confirm the audit dates (start and end) with the Audit Firm.
- Provide information on travel logistics, as requested, including preferred hotels and/or airports, travel restrictions, and any other special considerations.
- GPS Coordinates of the location of the entrance to the Auditee's facility (this will be included in the VAR)
- Participate in the pre-Audit meeting and documentation review.
- Understand the on-site Audit agenda.
- Prepare and provide documents requested by the Auditor, if any, prior to the Audit start date.
- Ensure that relevant information is available for the Auditors when they arrive, including:
 - Names, phone numbers and locations of the Auditee's key people, as defined by the auditor
 - Maps of the site and surrounding area
 - Most current manuals, records and documentation, required by the Auditor
- Ensure that Auditors will have access to all areas of the facility/facilities that are considered in-scope for the Audit (e.g. dormitories, canteens, manufacturing, assembly, chemical storage areas, ...).
- Ensure that working hour and wage data is available.
- Invite appropriate staff members to the opening meeting, closing meetings, daily wrap-ups, and to accompany the auditors during the site inspection.
- Provide the auditors with meeting room(s), preferably with access to a telephone/internet line, printer and copy machine.
- Brief auditee management and staff on the audit process.

Prior to the Audit, the APM is available for additional guidance, if needed.
 During the Live Audit, the QM is available for additional guidance.

During the Live audit the Auditee must:

- Populate the working-hours template after the auditors have selected the samples.
- Make appointments and set the interview schedule, as requested by the Auditors.

3.1.3. Optional Auditee Training

It is recommended that the Auditee who is new to the VA process, or those that would like to learn more about the VA process, attend an audit preparation training class on the VAP, helping them to learn about the audit process, the RBA Code of Conduct, RBA expectations, and how to better prepare for the Audit.

If your company is interested in additional training, please contact training@responsiblebusiness.org.

They can advise regarding options such as:

- In person training events featuring our newly formed dedicated Training team.
<http://www.responsiblebusiness.org/events/>
- Factory Lead Certification Program for CSR Professionals,
<http://www.responsiblebusiness.org/resources/flcp/>

3.2. Auditor Preparation:

All Auditors must understand

- The VAP, the VAP AC and AP.
- RBA Code of Conduct and associated interpretations and guidance
- Local law in the country where the Audit is conducted
- RBA member's requirement (if applicable), this will be communicated to the audit firm at the scoping stage (i.e. additional question sets) which may be subject to additional fees

The Audit Firm and Lead Auditor must ensure that all Auditors working in the Audit are RBA approved, knowledgeable and effective.

3.2.1. Audit Tools and Documentation

The Auditors must be familiar with and use the most up-to-date and current documents, tools, and AP during the Audit. Documents and tools include:

- AP (inclusive of all audit criteria questions, auditor guidance, report template, working hours template)
- Opening and closing meeting presentation slides
- VAP OM (this document) and attachments

If necessary, the Audit Firm should contact the APM for the most current documents.

3.2.2. Auditee Documentation

A thorough pre-Audit review of Auditee documents should be completed prior to the Audit. This includes, but is not limited to the following:

- Self-Assessment Questionnaire (SAQ)
- Objectives and targets
- Previous audit reports

If there is anything within these documents that may change the scope or duration of the Audit or may impact the Auditor's ability to effectively complete the Audit, including completing the audit within the time allotted for the audit, the APM must be notified as quickly as possible prior to the scheduled Audit date.

3.3. Pre-Audit Meeting

After the Audit is assigned to an Audit Firm, a pre-Audit meeting between the Auditor and Auditee must take place.

3.3.1. Initial Audits

For Initial Audits, the Audit Firm is responsible for scheduling and conducting a pre-Audit meeting with Auditee management; this pre-Audit meeting should occur between 3 to 10 days prior to the Audit.

The following items should be addressed in the pre-Audit meeting:

- Auditor introduction

- APM approved Audit scope
- Audit agenda
- Translation needs; mainly for worker interviews
- Travel requirements, if any, during the audit (auxiliary or support buildings, different facilities, ...)
- Logistics, if needed (directions, preferred hotels and/or airports, travel restrictions and any special considerations, GPS coordinates of main entry gate to Auditee facility)
- Site safety and security requirements
- Documentation preparation:
 - Confirm the documents that will be needed
 - Remind the auditee that documents must be ready at the start of the Audit
 - Determine what system access is needed, if any
 - Review of new and optional RBA-Online System function for sharing of documents by Auditee. For more information see Appendix 8
- Remind the Auditee that working hour and wage data must be available for review, Auditors will sample them based on the sampling methodology
- Require the working hours template be completed within 4 hours after the opening meeting
- Discuss requirements for access to on-site service providers; and their workers, and labor agents
- Request any additional documents and records that are needed for the Audit Team to prepare for the Audit (e.g. organizational chart, key staff members, on-site suppliers, ...)
- Set exact time of arrival and time of opening conference; remind of requirement of participation by the site manager and key staff
- Ensure there is space to complete the Audit, as well access to internet and phone (if needed)
- Solicit and answer any questions from the auditee regarding the Audit

For Labor Agent/Contractor and Service Provider Audits, the Auditor shall contact both the management team at the Auditee location as well as the sites where the workers are deployed. Worker interviews and a facility tour should be arranged at the sites where workers are deployed.

3.3.2. Priority Audits

For Priority Audits, the Auditor must have a pre-Audit meeting, and should discuss:

- APM approved audit scope
- Audit agenda
- Logistics, if needed
- Site safety and security requirements, if different than Initial Audit or if the auditor is from a different Audit Firm
- Translation needs, if different than Initial Audit
- Documentation preparation:
 - Confirm the documents that will be needed
 - Remind the auditee that documents must be ready at the start of the audit
 - Determine what system access is needed, if any
- If needed, remind the auditee that working hour and wage data must be available for review. Auditors will sample them based on the sampling methodology
- Request any additional documents and records that are needed for the Audit Team to prepare for the audit
- Set exact time of arrival and time of opening meeting; remind Auditee of the requirement that opening meeting must be attended by the site manager and key staff
- Ensure there is space to complete the Audit, as well access to internet and phone (if needed)
- Answer any questions from the auditee regarding the Audit

This communication may occur by phone or through email.

3.3.3. Closure Audits

For Closure Audits, auditor must have a pre-Audit meeting, and should discuss:

- APM approved audit scope
- Audit agenda
- Logistics, if needed
- Site safety and security requirements, if different than Initial Audit or if the Auditor is from a different audit firm
- Translation needs, mainly for worker interviews
- Documentation Preparation:
 - Confirm the documents that will be needed
 - Remind the auditee that documents must be ready at the start of the audit
 - Determine what system access is needed, if any
- If needed, remind the auditee that working hour and wage data must be available for review. Auditors will sample them based on the sampling methodology
- If needed, request any additional documents and records that are needed for the Audit team to prepare for the audit
- Set exact time of arrival and time of opening meeting; remind Auditee of the requirement that opening meeting must be attended by the site manager and key staff
- Ensure there is space to complete the audit, as well access to internet and phone (if needed)
- Answer any questions from the auditee regarding audit preparation

This communication may occur by phone or through email.

SECTION C AUDIT

1. AUDIT TEAM

Only Auditors from Audit Firms approved by the APM may perform Audits.

2. RBA AUDIT OBSERVER GUIDANCE AND FEEDBACK

Observers to the Audit may be present during the Audit. This is to ensure quality and integrity of the process as well as provide improvement feedback on the performance of the Audit Firms and Auditors.

The role of the Observer is to observe the audit and to provide feedback on the Audit process and the Auditors.

The Observer must be from an Attachment B Company (RBA Member Company) and have Social and/or Environmental, VAP or auditing experience; the RBA may provide exceptions to these requirements.

Only 1 Internal Observer and only 1 Attachment B Company Observer are allowed per Audit.

2.1. Observer Rules

The APM must be:

- Notified of the observer at least 2 weeks before the start of the Audit.
- Provided with the name of the observer, company, email address and mobile number.

The Observer:

- May participate in the site observation in the following areas:
 - Common areas (e.g. canteen, dormitories, general staff areas, pollution control, etc.)
 - Production areas specific to the Observer's company
- May observe and participate in the document review but may only review documents that either apply to the auditee as a whole or those related to their company's business with the Auditee.
- Will not interfere with the Audit in any way.
- Will not advise or influence the Audit Firm regarding the findings, process, scoring, or other parts of the Audit.

- Will not advise, guide or interfere with the management of Auditee.
- Will be introduced by the Audit Firm as the Observer in interactions with staff during the Audit.
- Will not participate in any formal interviews and may also be required to not participate in some or all informal interviews.
- Should attend all key on-site audit meeting, including the opening and closing meetings.

At the end of the Audit, the Observer completes the Observer Feedback Form and submit to the APM.

The Auditor keeps all information regarding workers, information learned from interviews, and all proprietary information confidential from the Observer.

Exceptions to these guidelines may be given by the RBA.

3. AUDIT SCOPE

3.1. Product Supplier Scope

For VA of a product supplier, the entire factory is 'in scope.' In scope means that all buildings and sections or areas of a facility are subject to the VA. This includes, but is not limited to:

- All lines of business and all auditee customer's production areas
- Production and non-production areas (equipment rooms, wastewater treatment, maintenance shops, etc.)
- Common areas
- Office areas
- Storage areas (material warehouse, shipping and receiving, chemical and waste storage, etc.)
- Canteens and kitchens
- Dormitories, hostels and any off-site housing of workers/migrant workers (if company or labor agent owns/rents accommodation for workers)
- Security room(s)
- Surrounding land within border of factory property

An Auditee may request a reduced scope VAP for any of the following reasons only (Auditees may choose to proceed with audits where the below conditions exist without limiting the scope at their discretion):

- Site has more than 40,000 in-scope workers
- Operations at the site that are not within the industry of the facility being audited
- Section(s) of the site are not accessible due to proprietary or confidentiality reasons and written confirmation must come from the head office (management) of the Customers. However, workers working in these areas will be subjected to the workers interview as per the sampling methodology
- Site has different companies operating within the same facility, which must include one or more of the following:

- Operating under a different legal entity or license
- Having different management systems (including tracking of hours and pay) and management teams
- More than 5 kilometers between facilities, if they are included in one audit, then APM would include travel time at the scoping stage
- May not share employees (employees cannot go back and forth between companies without resigning from one company and being hired at the next)

To initiate a scope exemption, the Auditee or Attachment B Company must submit a written request to the APM during the Audit scoping.

3.2. Labor Agency and Service Provider Audit Scope

For VA of a labor agency or service provider, the Audit scope includes both the labor agency or service provider site and the site(s) where workers are deployed. The scope of the Audit is determined as follows:

1. Full site under a business license.
2. Exclude all activities which are not related to providing a service to the audit customer(s).

Exclude all areas which are covered by a “do not audit” request from a competing customer that has lodged a written nondisclosure request from the Head Office. This request must be specific to the VA and must be submitted to the APM at the audit request stage.

The worker interviews and facility tours occur at the deployment site; all other activities occur at the labor agent or service provider office.

To initiate a scope exemption, the Auditee or Attachment B Company must submit a written request to the APM during the Audit scoping.

4. AUDIT PROCESS

The VA is conducted using the following process.

4.1. Audit Start

Upon site arrival, the Auditors will present identification.

The Auditor(s) must bring with them all Audit tools and equipment necessary for the Audit.

4.2. Opening Meeting

All Audits begin with an opening meeting. The Auditors must use the RBA Audit Opening Meeting Template as a foundation but can be modified as needed for the particular VA situation.

6.2.1 Auditor Requirements

The Auditor discusses the following topics in the opening meeting:

- Purpose and objectives of Audit
- Audit schedule, scope and approach
- Discussion of site observations, interviews, record reviews, taking field notes
- Discussion of representative sampling
- Introduction of Audit Observers
- Preparation for daily wrap-ups and closing meeting including APM notifications of Priority findings
- Report preparation and QA process
- Containment and remediation process
- Audit process and timelines

The Auditors should answer any questions the auditee may have.

6.2.2 Auditee Requirements

The Auditee should discuss the following in the opening meeting, if applicable:

- Visitor safety, security and escort protocols
- CSR program and organization assignment of responsibilities CSR accountabilities and organizational responsibilities
- CSR goals, performance and current issues
- Business climate for the facility
- Review of facility operations
- Identification of notable site activities occurring during the time of the audit including the seasonal changes of production load – high, moderate and low months / seasons.
- Major changes since the last audit
- Review of the pre-Audit documentation
- Interview schedules
- Identification and location of the Auditor work room(s)
- Phone and internet protocol and support personnel
- Review of site work hours
- Other information relevant to the auditors and the audit process

The Auditee is free to invite any Auditee site staff or employee to the opening

4.3. Interviews

Worker interviews are a sensitive topic, and proper management of the interview process is an important element of the Audit. Auditors should focus on obtaining information that enables an accurate evaluation of past and current operating practices. Interviews should be conducted in a manner that is cognizant of interviewee apprehension and nervousness.

There shall be no retaliation (e.g. reduction in pay or benefits, losing jobs, intimidation, or any other penalties) for any information discovered during an interview.

6.3.1 Worker Interviews

Throughout the Audit, the Auditors interact with workers gathering information in both formal and informal situations. Formal interactions are when the Auditors selects and interviews certain in-scope workers individuals. Informal interactions occur as the Auditors have brief interactions with workers at their place of work or in other areas of the factory (e.g. dormitories, canteens, common areas, parking area).

The number of formal interviews conducted should equal whichever of the following is larger: 20 workers or 100% of in-scope workers is equal or less than 20 approximately the square root of the total number of in-scope workers, including direct hired and indirect hired in-scope workers excluding management staff (e.g. 55 interviews for a factory with 3000 workers).

If the square root of the in-scope workers is less than 20 then the minimum sample of 20 applies. If the total in-scope worker is less than 20, then all the in-scope workers shall be interviewed.

Formal interviews are conducted privately, without the presence of Auditee managers, other staff or Observers. The workers identity and comments must remain confidential. Failure to do this will result in a penalty to the Auditors' performance score and possibly a suspension depending on seriousness of the violation.

Formal individual interviews generally last about 10 minutes. Formal group interviews typically last about 20 minutes, but may take longer, if needed, at the auditor's discretion.

Formal interviews are conducted in two ways: individually or in group settings. At least half of the interviews must be individual interviews. The ideal size for group interviews is between 5-8 workers (preferably five for small sample size, i.e. below 50; maximum of 8 workers per group for sample size above 50).

NOTE: If half or more of the required individual interviews are completed and all feedback is consistent with information provided by management and documents reviewed, then the Lead Auditor has the choice to group the rest of the workers in group interviews. However, if feedback is highly inconsistent on a topic the Lead Auditor must expand the sample size until sufficient evidence is found to triangulate other AC information.

Interviewees should represent a range of workers including:

- Permanent and temporary
- Both direct hired and indirect hired production workers
- Direct hired non-production workers (security, cleaners, food preparation)
- Employees and subcontract labor
- New hires and experienced workers
- More and less skilled positions
- Various departments and shifts
- All genders
- All nationalities (limited to foreign workers who are not foreign expatriate or skilled staff)
- Worker representatives, if present
- Pregnant woman, nursing mothers, and Workers with Disabilities, if present

NOTE: Indirect hired non-production workers (security, cleaners, food preparation) are not included in the group interviews, they can be individually interviewed during the site audit.

The Auditor should immediately inform the APM if site management is unwilling to allow interviews, or if the auditors feel that workers talking openly with auditors will compromise the workers. The APM will assess the situation in order to determine if the audit should continue.

The following information regarding interviews is to be documented:

- Total number of interviews
- Number of individual and group interviews
- Gender breakdown of interviews (e.g. 36 females, 32 males)
- Breakdown of direct and indirect hired (e.g. 40 direct hired, 28 indirect hired)
- The shift of workers interviewed, if applicable
- Issues with privacy and confidentiality of interviews, or of any retaliation or potential retaliation, if any
- Whether workers attended interviews freely

- Coercion concerns, if any
- Age range of interviews undertaken, including number of juveniles interviewed, if any
- Whether interviews were undertaken by the auditor or a professional interviewer

6.3.2 Management Interviews

Gathering information from managers provides the auditors with an understanding of how the auditee's CSR programs are managed and intended to be implemented.

Typically, the Auditors interact and talk with the following people (Note: not all of these people may be at the facility, and may have different titles):

- Site manager(s)
- Production manager(s)
- Maintenance staff
- Environmental, Health & Safety manager(s)
- Quality manager(s)
- Internal Audit manager(s)
- Human Resources manager(s)
- Onsite services staff such as canteen, dormitory supervisors, security staff
- Finance manager/payroll manager(s)
- Procurement manager/supply chain manager(s)
- Warehouse and chemical store manager(s)
- Onsite medical staff
- Legal
- Other personnel

4.4. Site observation

The purpose of the site observation is for the Auditors to observe physical conditions and current practices in all areas of the facility.

The Auditor should have access to all areas of the facility and should set the pace and direction of the site observation. During the site observation, the Auditors should endeavor to minimize disruptions to production.

It is the responsibility of the Auditee to inform the Auditors of the safety rules and requirements, including the use of personal protective equipment (PPE) in specific facility areas, and provide the Auditors with necessary PPE where required.

There are two parts to site observation, namely site tour and site audit.

6.4.1 Site Tour

Site tour is generally undertaken by the entire Audit Team and it will last for about 30 minutes.

At the start of the Audit, a site tour may be conducted. Portions of this site tour may take place prior to the opening meeting.

The objective of the site tour is to provide context to the auditors of the Auditee's operation and to help the Auditors prepare questions for further investigation.

The site tour may consist of:

- Transportation infrastructure
- Emergency services, such as fire department or outside security services
- Identifying potential local community and environmental concerns, which may impact or be impacted by the facility
- Understanding the size, scope and location of all building and support facilities

During the site tour, the Auditor typically inspects, observes and identifies areas of high risk (note: not all facilities have the following areas):

- Work environment (space, temperature, lighting, etc.)
- Ergonomics and workstations

- Manufacturing and processing operations
- Fire and emergency equipment
- Machine protection and maintenance
- Emergency procedures
- Personal protective equipment
- First aid equipment and medical center/clinic
- Air emissions and emission control systems
- Hazardous materials storage and handling
- Hazardous waste generation and storage
- Waste (hazardous and non-hazardous) management
- Fuel, chemical and oil storage, transport and use
- Toilets and sanitation
- Canteen and kitchen hygiene and safety, when applicable
- Dormitory facilities including hygiene and safety
- Wastewater treatment, discharge and sludge disposal
- Recreational facilities
- Unreasonable restriction on workers' freedom of movement or rights
- Quality, production and time records
- Posting of relevant codes and any worker information relating to their rights
- Workers' notice boards and information relating to union or worker's committee meetings
- Any records or documents displayed that might show a discrepancy between operational activities and the protection of human rights

6.4.2 Site audit

The site audit is carried out by the EHS Auditor and it will last from 4-8 hours depending on the number of areas / buildings / facilities / dormitories, canteen to be covered.

During the site audit, the Auditor typically inspects in detail of all the high-risk areas identified during the site tour (note: not all facilities have the following areas):

- Work environment (space, temperature, lighting, ...)
- Ergonomics and workstations
- Manufacturing and processing operations
- Fire and emergency equipment
- Machine protection and maintenance
- Emergency procedures
- Personal protective equipment
- First aid equipment and medical center/clinic
- Air emissions and emission control systems
- Hazardous materials storage and handling
- Hazardous waste generation and storage
- Waste (hazardous and non-hazardous) management
- Fuel, chemical and oil storage, transport and use
- Toilets and sanitation
- Canteen and kitchen hygiene and safety, when applicable
- Dormitory facilities including hygiene and safety
- Wastewater treatment, discharge and sludge disposal
- Recreational facilities
- Unreasonable restriction on workers' freedom of movement or rights
- Quality, production and time records
- Posting of relevant codes and any worker information relating to their rights
- Workers' notice boards and information relating to union or worker's committee meetings
- Any records or documents displayed that might show a discrepancy between operational activities and the protection of human rights

In some cases, for safety, security and/or commercial confidentiality reasons, the site management may prevent visitors from walking unaccompanied through portions the site. In such cases, auditors should follow the Auditee policies.

Auditors should obtain permission to take photos in the facility. Alternatively, the Auditee can take photos as requested by the Auditors and provide them by the end of each day to the Audit Team. If the management does not give such permission and will not take requested photos (either as a whole, or in certain areas), Auditors will document this in the AR. Photos are not intended to contain or focus on product, product information or any other proprietary information.

4.5. Document Review

As part of the Audit, the Auditors review relevant records. Examples include:

- Working hour records, payroll, wages, deductions and benefits
- EHS management system documentation
- Permits/ licenses /approvals
- Waste records
- Written policies, programs, procedures, work instructions
- Training records

The records to be reviewed are specified by the Auditors to the auditee during the Audit.

The Auditors should be thorough in the review of records; however, this does not mean that every record must be evaluated. The Auditor may use representative sampling in the review process. Where the Auditor does not review every record and there is a non-conformance finding, the Auditor must reflect the sampling method in the statement of finding.

Unless otherwise stated, the documents, and records must be available on-site for Auditors to review, and must cover at least the previous 12 months for VA. For payroll, wages, deductions and benefits documents and records must be available for 24 months

- For Audit Criteria related to Labor, two different approaches are taken for sampling. For Working Hours (A2) a minimum of three months of pay and work time records are reviewed for each selected worker for the 12-month period prior to the Audit. The three months reviewed are the highest, lowest and an average month. In the case of a Closure Audit, three months of pay and work time records are reviewed for each selected worker from the period of corrective action implementation till date of Audit (not exceeding one year).
- For Wage, deductions and benefits topics (A1, A3 and A4) records maybe reviewed as above for each selected worker, however the Auditor may look back over the 24-month period prior to the audit.

The documents that Auditors review must be available at the start of the onsite Audit process, if requested prior to the audit, or on the same day if requested during the audit. If documents that were requested prior to the Audit are not available 4 hours from the start of the Audit, the documents may be excluded by the Auditor and may be classified as not present.

As part of the documentation review, the Auditors may need to record some information to complete their evaluation. The Auditors will not include any confidential information, such as detailed product information, detailed process steps, or personal identifiers in the AR.

The number of pay and work time records per month reviewed must equal at least the square root of the total number of “in-scope” workers at the site or a minimum of 20 whichever is larger or 100% of in-scope workers is equal or less than 20 even if Auditors have interviewed less than that number.

Unless otherwise noted, references to percentages of workers in conformance or non-conformance are based upon the defined sample.

4.6. Daily ‘Wrap-up Meeting’

Daily wrap-up meetings occur at the end of each day and are approximately 30 minutes or less. During the meeting, the Auditor should:

- If Priority non-conformances were identified:
 - Discuss any Priority non-conformances, including need for immediate correction and/or containment.
 - Inform Auditee management that a formal communication of Priority non-conformances will be made to the QM, who will in turn notify the audit customers.

- Make the Auditee aware of any issue, finding, or potential finding where additional information is needed.
- Encourage the Auditee to present/prepare additional evidence or information on local legal requirements, as needed.
- Discuss preliminary findings, providing the opportunity for the Auditee to provide additional information in the case of a disputed finding.
- Agree upon the agenda for the remaining onsite Audit.
- Clarify any further needs to ensure the Audit is performed as effectively and efficiently as possible.

4.7. Closing Meeting

The Closing Meeting is held at the end of the last day of the Audit. The same group of Auditee personnel, including workers that participated in the Opening Meeting, as well as any others who would benefit from hearing from the audit team, should attend the Closing Meeting.

Closing meetings are to be conducted using a formal presentation. The Auditors must use the RBA Audit Closing Meeting Template as a foundation but can be modified as needed for the particular audit situation. If the meeting is not conducted or is cut short, auditees should notify the QM.

The Closing Meeting includes the following:

- A discussion of all Major and Priority non-conformance(s), ensuring that the Auditee fully understands those issues.
- A brief discussion of all Minor non-conformance(s)
- Discussion of issues in which the Auditors need to conduct further studies (e.g. investigate or review relevant legislation) to establish a finding.
- If Priority non-conformance were noted during the audit:
 - Communicate that immediate containment actions are mandatory (unless working hours, recruiting fees and social insurance).
 - Immediate containment actions should be completed by the end of the audit, or as quickly as possible if the issues were discovered late in the audit.
 - Auditor will list the status of the immediate containment actions as “auditor note” in the conclusion of the applicable question in the AR and Audit Finding Acknowledgement (AFA).

- Presentation, by the Auditee, of additional evidence or clarification.
- Inform on the next steps of the Audit process, including the draft review feed-back process.
- Thank the facility for their cooperation during the audit.

The AFA statement is signed at the end of the closing meeting.