



# Responsible Business Alliance

---

Advancing Sustainability Globally

## **RBA Membership Compliance Program Document September 2020**

1725 Duke Street  
Suite 300  
Alexandria, VA 22314  
USA  
Tel. 571-858-5720

# Table of Contents

1. RBA’s vision and mission and eligibility definition .....	3
2. Purpose of this document .....	3
3. Scope .....	3
4. Definitions.....	3
4.1. RBA Membership status .....	3
4.2. Member facility .....	3
4.3. Major supplier .....	4
4.4. Major Supplier facility.....	4
4.5. RBA audit .....	4
4.5.1. Validated Audit Process (RBA VAP) .....	4
4.5.2. RBA Auditee Managed Audit (RBA AMA).....	4
4.5.3. RBA Customer Managed Audit (RBA CMA).....	4
4.6. RBA-ONLINE .....	4
4.7. Risk Assessment 1 (RISK ASSESSMENT LEVEL 1) .....	4
4.8. Self-Assessment Questionnaire (SAQ).....	4
4.9. High risk facility.....	4
4.10. Disqualifying priority finding .....	5
5. Membership Requirements .....	5
<input type="checkbox"/> General requirements.....	5
<input type="checkbox"/> Administrative requirements .....	5
<input type="checkbox"/> Full Member requirements.....	5
6. Non-attainment of requirements.....	9
7. Member Assistance .....	11
Appendix 1 - Examples.....	12
Appendix 2 - Sample Commitment letters.....	13
Appendix 3 - Guidelines for Public Acknowledgement .....	14
Appendix 4 - Full Member Checklist .....	17

## 1. RBA's vision and mission and eligibility definition:

**Vision:** A global electronics industry that creates sustainable value for workers, the environment and business.

**Mission:** Members, suppliers and stakeholders collaborate to improve working and environmental conditions through leading standards and practices.

**RBA Eligibility Definition:** RBA membership is open to companies that manufacture or contract the manufacture of electronic goods or a product in which electronics are essential to the primary functionality of the product, or supply materials used in the electronics of those goods. For our current list of RBA members, please visit our [website](#) list.

To ensure that the RBA remains credible in its efforts, requirements for membership have been defined through this policy. It is important for members, on their journey of continuous corporate social responsibility improvement, to meet the requirements. The RBA will assist on this journey through the definition of a common Code of Conduct, standardized tools and process, and learning opportunities.

2. **Purpose of this document:** Increase credibility for the RBA as the leading promoter of corporate social responsibility in the industry by clearly defining RBA membership requirements and actions for non-attainment of membership requirements.
3. **Scope: The policy is applicable to all RBA members.**
4. **Definitions:**

### 4.1. RBA Membership status

As part of RBA's 2015 strategic implementation plan, RBA moved from the previous two member categories (Applicant and Full member) to four categories (Supporter, Affiliate, Regular Member and Full Member). Affiliate and Member are similar to the previous Applicant and Full Member however the requirement to move to Full after two years as an Applicant no longer exists. These categories are progressive in responsibilities (and some benefits) and designed to help companies build their compliance programs at their pace using RBA tools, while also challenging those who have been involved in compliance for some time. At any point when they are ready, members may choose to be evaluated for the next category up by submitting an email and required documentation to RBA. These categories were effective for new members as of October 1, 2016 and for existing members as of January 3, 2017. There is currently no RBA requirement to upgrade membership category.

- **RBA Supporter Member:** Member company who supports the overall vision and mission of RBA as part of the membership application.
- **RBA Affiliate Member:** Member company who meets all membership requirements as defined in the General Membership requirements section.
- **RBA Regular Member:** Member company who is working toward meeting all membership requirements as defined in the General, Administrative and Member requirement sections.
- **RBA Full Member:** Member company who is working toward meeting all membership requirements as defined in the General, Administrative, Regular and Full member requirement sections.
- **Released Member:** Former Member who did not fulfill membership requirements.

### 4.2. Member facility

- All facilities owned or leased by the member that are used to manufacture, assemble, or package the member's products. Member facilities include joint ventures when the company owns  $\geq 51$  percent. If member company is unable acquire necessary information (e.g. SAQs) due to legal

structures, please notify RBA and appropriate considerations will be given.

- Excluded facilities: stand-alone administrative, management, distribution, chemical distribution, and remote employee locations, as well as sales, design or call center buildings. (Please contact RBA staff for information about indirect spend and chemical management tools that are available).

#### **4.3. Major supplier**

A supplier is considered a member's major supplier if the supplier is:

- Ranked in member's top 80 percent of direct suppliers by spending, AND
- Contracted to provide service or material input for member's finished goods or services, OR
- Under the control of the member, even if services or materials are not directly conveyed to the member

See **Appendix 1** for examples of major suppliers.

#### **4.4. Major Supplier facility**

All facilities owned or leased by the Supplier that are used to manufacture, assemble, or package the company's products. Supplier facilities include joint ventures when the company owns  $\geq 51$  percent. Excluded facilities: stand-alone administrative, management, distribution, chemical distribution, and remote employees' locations, as well as sales, design or call-center buildings.

#### **4.5. RBA audit: Audit conducted on a member facility or major supplier using:**

- 4.5.1. Validated Audit Process (RBA VAP):** The highest standard of RBA audits. VAP is administered through the RBA and its Audit Program Manager (APM). VAP can be paid for by the Auditee and/or customer(s) of the Auditee. Audit is performed by an RBA approved audit firm with qualified auditors. The Audit Quality Manager (AQM) performs extensive Quality Assurance and verification of audit findings. Process ensures auditee agrees to Corrective Action Plan with closure audit. Output of the Validated Audit is a watermarked Validated Audit Report which the auditee is given ownership of and is able to provide to all customers. Sharing of the Validated Audit Report (VAR) is directly intended to eliminate duplicate audit requests from customers. VAP enables site level recognition from the RBA, OR
- 4.5.2. RBA Auditee Managed Audit (RBA AMA):** An audit paid/overseen by the auditee; conducted by an outsourced RBA approved audit firm. No external verification of audit findings; does not enable site level recognition from the RBA. OR
- 4.5.3. RBA Customer Managed Audit (RBA CMA):** An audit paid/overseen by a customer of an auditee; conducted by that customer's staff or an outsourced RBA approved audit firm. No external verification of audit findings; does not enable site level recognition from the RBA.

Please refer to the RBA website for more information about the Validated Audit Process.

- 4.6. RBA-ONLINE:** A robust technology platform that supports supplier engagement and improvement in social and environmental responsibility. All RBA members have access to this system as a part of membership.
- 4.7. Risk Assessment 1 (RISK ASSESSMENT LEVEL 1):** First level of risk assessment. RBA currently has a custom portal available to members through RBA-ONLINE. The risk indices are based on the RBA Code and other criteria (such as site's geographical location, function, criticality, spend, third party audit data etc.), and is not determined by company's individual performance.
- 4.8. Self-Assessment Questionnaire (SAQ):** Standardized list of questions to be used to assess a single site's labor, ethics, health and safety and environmental practices in the supply chain, based on the RBA Code of Conduct. This is the second level of member and supply chain risk assessment.
- 4.9. High risk facility:** A member facility, supplier or supplier facility that scores 65 percent or less on a

total of at least five sections of the SAQ<sup>1</sup>. The presence of any disqualifying non-conformances indicates immediate High-Risk status.

Identified by a member company using a risk assessment methodology chosen by the member. Risk assessment methodology/tool may be a RISK ASSESSMENT LEVEL 1 or SAQ, or other methodology chosen by the member that meets or exceeds RISK ASSESSMENT LEVEL 1 or SAQ.

**4.10. Disqualifying priority finding:** For the purposes of regular and full member categories and member compliance, starting in January 2017, a subset of “disqualifying” priority findings was identified as follows:

Labor:

- Child Labor
- Forced Labor
- Bonded Labor
- Inhumane treatment

Health and Safety:

- Imminent health and safety issues as defined by VAP
- Imminent environmental risk as defined by VAP

Other:

- Falsifying records
- Bribery

**All Disqualifying Priority findings require a closure audit (VAP or 3<sup>rd</sup> Party CMA/AMA).**

Please refer to the detailed list of these in the Member Service Portal Member Compliance folder.

**5. Membership Requirements: For ease of reference, membership requirements have been defined in three sections:**

- **General requirements:** applicable to all members in execution of membership requirements
- **Administrative requirements:** split between one-time (due at membership acceptance) and annual requirements; applicable to all members
- **Full Member requirements:** advanced requirements related to fully implementing the Code of Conduct in members’ operations and those of their supply chains, and verification of these activities by RBA staff

**General Requirements**

**All members:**

**5.1.** Meet all requirements by the published timeline

**Regular and Full member:**

**5.2** Use RBA–developed audit tools to submit information and perform audits. The Validated Audit Process (VAP), and third party RBA Auditee Managed Audit (RBA AMA) and third party RBA Customer Managed Audit (RBA CMA) will be accepted. Where applicable, use standard RBA tools and processes. (Members at other levels can take advantage of RBA tools but don’t need to report on their compliance activities to RBA).

---

<sup>1</sup> Scores under 5 are considered high risk

- 5.3 Use online member compliance report in RBA-Online to submit information to RBA on a biannual basis (July and January).
- 5.4 Ask for clarification if you do not understand a requirement or need assistance

### **Administrative requirements**

#### **All members**

- 5.5 All members must complete membership application and submit it to RBA (one time) and pay dues within 60 days of membership acceptance and initial formal invoicing (and annually thereafter).

#### **Supporter member requirements:**

- 5.6 Support the overall mission and vision of RBA as part of the membership application

#### **Affiliate, Regular member and Full member categories.**

Administrative Requirements are the only requirements for Affiliate members, while Regular and Full members are also required to fulfill requirements related to the RBA Code of Conduct.

- 5.7 Provide a commitment letter signed by a senior executive of the company agreeing to support the RBA's vision, mission, and bylaws/operating principles; included in membership application (see page 2 of membership application and Appendix 2 for sample letters)
- 5.8 Publicly acknowledge the company's inclusion in the RBA, within 30 days of membership acceptance. This can be via the company website, company report, and/or a press release. (See Appendix 3 Guidelines for Public Acknowledgement)
- 5.9 Submit a completed and scored corporate-level SAQ within 90 days of membership acceptance in RBA-Online
  - 5.9.1 Excluded member facilities are assumed to be included in the member's Corporate SAQ

### **Annual membership requirements**

- 5.10 Pay annual dues in full by the published due date as defined by Section 6 of the RBA Bylaws, 60 days from invoice date [see Bylaws, sec.6]
- 5.11 Active participation in RBA is encouraged, including, but not limited to,
  - 5.11.1 Participation on one or more RBA work groups or task forces, through meeting attendance and seeking leadership roles (if eligible),
  - 5.11.2 Attendance at a minimum of one membership meeting per year, and/or seeking available Board of Director positions (if eligible)
- 5.12 Provide requested data per published timeline for RBA reports, including but not limited to the Annual Report
- 5.13 Read and understand by-laws and membership requirements.

## **Additional Regular and Full Member Requirements (in addition to the above requirements)**

Regular and Full Members have fulfilled the administrative requirements, are deepening their commitment to the RBA Code of Conduct and are using the tools and processes that are available to members. These requirements reflect the continuous improvement journey that companies undertake as members of the RBA.

Additionally, these members are encouraged to use the risk assessment platform RISK ASSESSMENT LEVEL 1 and self-assessment (SAQ) tools. These tools will identify issues in a company or facility earlier in the process than an audit, ultimately reducing the number of audits that need to be completed. They also prepare a facility for an audit, enabling them to spot and address issues themselves, including through the use of RBA's capability building tools.

### **5.14 Adopt the Code of Conduct as follows:**

- 5.14.1** Publish externally and submit to RBA a statement within 60 days of becoming a Regular or Full Member indicating company-wide adoption of the RBA Code of Conduct<sup>2</sup>. The statement must demonstrate the Company's commitment to the Code of Conduct for all member operations according to the RBA's mission and vision, and must be released in a company report, on company website or issued in a media release.
- 5.14.2** Adopt the Code of Conduct as supplier code of conduct within 60 days of becoming a Regular or Full Member. The Code must be adopted either verbatim or verbatim with a specific addendum<sup>3</sup>.

### **5.15 Demonstrate progress toward conformance to the Code for member facilities as defined in this program<sup>4</sup>:**

#### **5.17.1 Annually assess member facilities and provide bi-annual updates:**

- 5.17.1.1** Complete and score SAQs to identify high-risk facilities<sup>5</sup>
  - Corporate-level: reviewed and updated annually.
  - All member facilities: reviewed and updated annually after the first year of membership.
- 5.17.1.2** Submit corporate-level SAQ
  - Submit the member facility totals required in the member compliance report from the SAQ results<sup>6</sup>
    - a.) total number of member facilities
    - b.) total number of member facilities with completed SAQs

---

<sup>2</sup> If a member chooses to use their own pre-existing code of conduct covering their own member facilities, the code must meet or exceed the RBA's Code of Conduct. The member will conduct due diligence on their code of conduct and provide RBA staff with a comparison, outlining the equivalent or more stringent requirements in the member code when compared to the RBA's Code. A Code mapping document is available from RBA, please check the Member Compliance folder of the Member Service Portal.

<sup>3</sup> Member Company is responsible for any variance between the RBA Code and the Supplier's own code. If the member chooses to include an addendum to RBA Code, Member Company must submit an analysis of the differences between the RBA's Code and the addendum.

<sup>4</sup> At this time, the RBA Compliance Program will focus oversight efforts on member facilities as defined in this document, but there is an intention of adding to this definition as the program evolves.

<sup>5</sup> Company is required to submit summary of facility information from SAQ rather than full SAQ.

<sup>6</sup> If the total number of member or supplier facilities *increases* during a Compliance year, the new facilities will be tracked separately and will not affect the original total submitted at the beginning of the Compliance reporting period. . Members are not required to conduct Validated Audits on the new facilities but must use the RBA audit checklist to assess them. If the total number of member/supplier facilities *decreases* during a Compliance year, the member must indicate the total facilities released in the designated row The adjusted member/supplier facility total and required audit total should be entered into the column of the *following* quarter. Facilities totals will be re-evaluated at the beginning of each Compliance year.

c.) total number of high-risk member facilities

**5.16** Conduct RBA approved audits (VAP, CMA or AMA)<sup>7</sup> annually for at least 25 percent of high risk member facilities<sup>8</sup>

**5.16.1** Submit total number of audits to be conducted

**5.16.2** Submit required Corrective Action summary information

- a.) total number of disqualifying priority findings
- b.) total number of open disqualifying priority findings
- c.) total number of closed disqualifying priority findings<sup>9</sup>
- d.) close disqualifying priority non-conformances per audit timeline

**5.17** Ensure adoption of the Code by major suppliers.

It is preferable that members utilize RBA tools for supply chain management, consistent with the objectives of the RBA to utilize a range of RBA training and assessment tools to support continuous improvement in the social, environmental and ethical responsibility of their supply chains. RBA members are expected to accept a completed RBA Validated Audit (less than 18 months old) from a facility instead of conducting additional audits for CSR criteria on the same facility<sup>10</sup>. If a member requires more than one RBA approved audit (VAP, CMA or AMA) within the 18 month timeframe, then the customer and supplier must reach settlement independently from RBA, while ensuring that all minimum RBA Compliance requirements are met.

If a member is found to be conducting an excessive number of additional audits, where there are available RBA validated audits, without reasonable justification of exceptional circumstances that demand additional audits AND complaint is brought to the staff, staff will take appropriate action to discourage such excessive auditing by the member involved.

**5.17.1** Annually assess supply chain<sup>11</sup>

- Submit required major supplier information:
  - a.) total number of major supplier facilities
  - b.) total number of major supplier facilities with completed RISK ASSESSMENT LEVEL 1 or SAQs
  - c.) total number of high-risk major supplier facilities
    - Conduct a VAP, AMA or CMA<sup>12</sup> on 25% of high-risk major supplier facilities. It is a best practice to audit at least one facility from every high-risk major supplier.

---

<sup>7</sup> Staff will accept VAP and third party AMA/CMA audits.

<sup>8</sup> Excluded member facilities are not currently subject to audits; the RBA's current focus is on manufacturing/production facilities. If a member company does not have manufacturing facilities, the RBA assumes that the member's focus is on their supply chain manufacturing facilities.

<sup>9</sup> The RBA's current priority is on the manufacturing and production of physical products. However, if a priority non-conformance arises in a non-production location of a member company, the member will be required to respond with corrective actions. Members are expected to have a holistic management program in place even though the RBA is not currently focused on non-manufacturing or non-production facilities.

<sup>10</sup> Exceptions that are acceptable as of 2017 include: 1) IP at risk (but member can do a complementary audit to cover the parts that are not covered in the VAP audit they are receiving. Example: If member A wants to audit Supplier 1. Supplier 1 has a recent VAP audit and provides that to member A and requests that they not audit them. Member A should accept the VAP audit from Supplier 1 but may go in and audit anything that is critical to the member that was not covered by the VAP audit). 2) Crisis Management (e.g. NGO report comes out and member needs to do their own audit, not accept a recent VAP audit).

<sup>11</sup> If the total number of supplier facilities increases during a Compliance year, the original total will not be adjusted on the Supplier Summary tab mid-year. Instead, new supplier facilities will be submitted and tracked separately in the designated row on the Summary form. Supplier facilities totals will be reevaluated at the beginning of each Compliance year. If the total number of supplier facilities decreases during a Compliance year, the member must note the total member supplier facilities closed/released in the designated row on the Suppliers Summary form. The adjusted supplier facility and required audit totals should be entered during the next reporting deadline.

<sup>12</sup> RBA will accept VAP and AMA/CMA audits



### 5.17.2 Review audit disqualifying priority non-conformances

- Submit major supplier corrective action summary information.
  - a.) total number of audits conducted
  - b.) total number of disqualifying priority non-conformances
  - c.) total number of open disqualifying priority non-conformances
  - d.) total number of closed disqualifying priority non-conformances. Members must work with their suppliers to close disqualifying priority non-conformances per audit timeline (see Guidance Document online)

As of 2020, the member compliance report in RBA Online will automatically populate with information that exists in RBA Online and members will have the ability to add information not available in RBA Online. Please refer to the guidance document available in the RBA Member Service Portal for more information.

### **Additional requirements for Full Members**

**5.18** In addition to the above, Full Members must have the requirements above verified by RBA and must also publish corporate responsibility data. Failure to meet the above requirements will result in the RBA member staying in Regular Member category (or other) until all information has been submitted and verified. RBA has made available an offline checklist for Full Members (see Appendix 4). This category must be applied for in RBA Online (see Full Member Checklist).

## **6. Non-attainment of requirements:**

To ensure RBA remains a credible organization, members must meet the membership requirements in their journey toward continuous improvement. In a situation where that does not happen, RBA will work with the member company in question to meet the requirements, or else be moved to the preceding/most suitable category until all requirements of the original category can be met again. In serious situations, RBA reserves the right to suspend or release a member.

Note: If a member, even with best effort, cannot complete a specific membership requirement within the designated timeframe, they must notify the RBA.

### **6.1. Changes in membership category (downwards to Supporter or Affiliate) or membership suspension and release**

#### **6.1.1. Member companies:**

- Lose ability to vote on decisions requiring Regular and Full member votes (i.e. Code changes, Board of Director elections, etc.).
- Temporarily resign their seat on the Board (if applicable)
- Temporarily resign participation as work groups or task force leads (if applicable)
- Request additional help, guidance, or mentoring as needed to fulfill membership requirements
- In cases where a member will be released, (“termination”) procedures established by RBA Bylaws will be followed.

### **6.2. Annual membership requirements**

- Annual dues
  - See Bylaws Section 6 for guidelines relating to late payment of dues
- All other Administrative requirements:
  - If a member fails to meet annual administrative requirements per published timelines, they have 30 business days from notification to resolve the issue

### **For Regular and Full Members:**

### **6.3. Failure to Adopt Code of Conduct**

The Code of Conduct is a critical component of the RBA's ability to enable members to improve the social and environmental conditions in the global supply chain. Without member adoption of this common standard, there is no standard platform to enable and drive improvements.

- If a member fails to submit a statement indicating company-wide adoption of the Code (including as supplier code of conduct) or to show addendums to the Code (as applicable), they have 30 business days from notification to resolve the issue
- Outstanding information will result in member being placed in Affiliate (or Supporter) category until all outstanding information has been received

**6.4. Failure to demonstrate progress toward conformance to the Code**

The RBA would like to understand how the member company is working to reduce the high-risk areas for all high risk facilities. This requires:

Submitting the required SAQ results for member facilities

- Members have 30 days from notification to submit the required information or a detailed plan as to the timeline to submit
- Outstanding submissions will result in member being placed in Affiliate (or Supporter) category until all outstanding information has been received

**6.5. Failure to audit member's applicable (high-risk) facilities and submit corrective action progress reports**

**6.5.1.** If a member fails to audit 25% of their own high-risk facilities by the end of the calendar year, they have 10 business days from notification to submit an audit plan

- RBA will review plan and provide feedback to member, including plan agreement or request for more details. Member is required to complete audits in agreed upon timeframe.
- If a member fails to submit a plan within 10 business days, they will be moved to Affiliate (or Supporter) category. While it is expected that they submit a plan by the end of the first quarter, it is preferred that required audits are completed during this time.
- If a plan is submitted during the first quarter, RBA will review plan and provide feedback to member, including plan agreement or request for more details.
- Failure to submit a plan to complete the previous year's audits AND failure to complete audits in the first quarter results in member staying in Affiliate (or Supporter) category

**6.5.2.** Failure to submit required Corrective Action summary information

- If a member fails to submit member facility audit summary, they have 30 days from notification to submit the information
- If a member fails to provide required Corrective Action information for disqualifying priority non-conformances, they have 30 days from notification to submit the reports
- Outstanding required information past 30 business days will result in member's category change to Affiliate (or Supporter)

**6.5.3.** Failure to address disqualifying priority findings in a member facility

Disqualifying Priority findings can happen even with members working to apply and implement the Code in their operations in a structured fashion. If this happens, members have:

- 90 days from receipt of audit report to implement corrective action(s)
- Unaddressed disqualifying priority non-conformances outstanding after 90 additional days results in change to Affiliate (or Supporter) category

**6.6. Failure to assess supply chain risk based on RBA standards**

Sustainable change happens through the integration of the supply chain using RBA standards.

**6.6.1.** If a member fails to identify how they assess supply chain risk, OR

- 6.6.2.** If a member fails to submit the number of high-risk suppliers/supplier facilities OR major suppliers/major supplier facilities, they have 30 business days from notification to resolve the issue.
- 6.6.3.** Outstanding submissions past 30 business days will result in change to Affiliate (or Supporter) category

**6.7. Failure to audit high risk supplier facilities**

Audits are a critical step in the supplier engagement model, helping suppliers on their continuous improvement journey. Additionally, development and implementation of resulting corrective actions can improve adherence to the Code and business processes.

- 6.7.1.** If a member fails to conduct supplier audits by the end of the calendar year, they have 10 business days from notification to submit their timeline to complete all audits.
  - RBA will review plan and provide feedback to member, including plan agreement or request for more details. Member is required to complete audits in agreed upon timeframe.
  - If a member fails to submit a plan within 10 business days, they will be moved to Affiliate (or Supporter) category. While it is expected they submit a plan by the end of the first quarter, it is preferred that required audits are completed during this time.
  - If a plan is submitted during the first quarter, RBA will review and provide feedback to member, including plan agreement or request for more details
  - Failure to submit a plan to complete the previous year's audits AND failure to complete audits in the first quarter results in member staying in Affiliate (or Supporter) category

**6.8. Failure to submit required supplier information**

- 6.8.1.** If a member fails to provide the required supplier information for supplier disqualifying priority non-conformances, they have 10 days from notification to submit the information
- 6.8.2.** If a member fails to submit the required supplier information, they have 10 days from notification to submit the reports
- 6.8.3.** Outstanding issues open past 10 business days will result in member's category change to Affiliate (or Supporter)

**7. Member Assistance**

If a member's category is changed for non-attainment of member requirements, the RBA will offer the following assistance to the company:

- 7.1.** Inform member of member compliance non-conformances
- 7.2.** Review mitigating circumstances that may allow for category change extensions
- 7.3.** Assign a staff member for regular updates to track progress until the outstanding issues are resolved
- 7.4.** In the case of a disqualifying priority finding, RBA will make reasonable effort to provide Member Company with available resources. This may include best practice sharing sessions with a member of the Board or with a work group (topical) expert<sup>13</sup>.
- 7.5.** RBA will hold a phone or web session to review the member resources.

---

<sup>13</sup> Pairing will occur based on expertise of a work group resource, not based on company relationship. The member receiving help or work group resource has the option to decline participation in best practice sharing sessions if concerned about business relationships between companies.

## Appendix 1 - Examples

### 1. Major supplier

A supplier is considered a member's major supplier if the supplier is:

**1.1.a** Ranked in member's top 80 percent of direct suppliers by spending, AND

**1.1.b** Contracted to provide service or material input for member's finished goods or services<sup>14</sup>, OR

- *Example 1: Member is a retailer – major supplier would be a brand/OEM*
- *Example 2: Member is a Brand/OEM – major supplier could either be a contract manufacturer or component supplier, depending if the Brand/OEM does their own manufacturing*
- *Example 3: Member is a contract manufacturer – major supplier would be a component supplier*
- *Example 4: Member is a component supplier – major supplier could be a raw material supplier or sub-tier component supplier*

**1.1.c** Under the control of the member, even if services or materials are not directly conveyed to the member

- *Example: Contract Manufacturer B (CMB) is considered a major supplier to Brand A (BA). BA directs CMB to procure materials from Component Supplier C (CSC) for BA's products that are manufactured by CMB. Unless previous agreement exists between BA and CMB, it is assumed that CSC is a major supplier to BA.*

---

<sup>14</sup> The current intention of the Compliance Program is to focus on manufacturing, excluding any service provider that does not produce manufacturing-related services. Please contact RBA staff for tools that are available for indirect suppliers.

**Appendix 2 - Sample Commitment letters**  
Commitment letters should be on company letterhead

**For Affiliate, Regular and Full Member Categories**

Date

Address

Dear RBA Board of Directors,

On behalf of (insert company name) and in support of our application for RBA membership, I am writing to state my company's commitment to supporting the RBA's mission, vision, bylaws, membership requirements and the Code of Conduct. In addition, our company is committed to meeting all the requirements of membership as outlined in the Membership Compliance Program.

Sincerely,

CEO (or CEO-1) Name

**For Supporter Member**

Date

Address

Dear RBA Board of Directors,

On behalf of (insert company name) and in support of our application for RBA membership, I am writing to state my company's commitment to supporting the RBA's mission and vision, bylaws and membership requirements.

Sincerely,

Company representative

## **Appendix 3 - Guidelines for Public Acknowledgement** **Guidelines for public acknowledgement of RBA member commitment**

When publicly acknowledging their commitment to the RBA, as part of the membership requirements, members will adhere to the following guidelines:

### **1. RBA members will (in your own words):**

#### **All members:**

- Mention support of the Vision and Mission of the RBA
- Choose words that respect the collective approach of the RBA and what members intend to achieve together
- Spell out the RBA's name on first reference as follows: Responsible Business Alliance (RBA)

#### **Affiliate, Regular and Full Member only:**

- Commit to comply with the RBA Code of Conduct in your own operations with a continuous improvement approach

#### **Regular and Full Member only:**

- Commit to progressively apply the RBA Code of Conduct to first-tier suppliers, where applicable, and monitor its application to the best of the company's ability using RBA tools and approach
- (If you wish) make reference to your specific efforts to implement the RBA approach in your operations and in your supply chain

### **2. Members will not:**

- Refer to the RBA approach in any sense as a certification
- Suggest that your company is leading the RBA or is more advanced than the RBA standard or other RBA members
- Write anything that puts the RBA or other RBA members in a negative light
  - (includes reference to internal disagreements or differences of opinion)
- Focus on differences between the RBA Code of Conduct and your company's additional requirements of suppliers
- Mention names of your suppliers or customers or any details of business relationships that may have anti-trust implications (in the public statement)
- Make reference to specific stakeholder-related issues or controversial press articles
- Mention other members by name

Please send proof of public acknowledgement to:

RBA Membership Team

[membership@responsiblebusiness.org](mailto:membership@responsiblebusiness.org)

See following pages for sample text. If your company intends to issue a press release about joining the RBA, we ask that you share it with the RBA for review before it is publicly released, so that we can ensure the RBA is correctly portrayed. Please send the draft release and any requests for a supporting quote from the RBA to: [communications@responsiblebusiness.org](mailto:communications@responsiblebusiness.org)

### **1. For Supporter Members**

As a Supporter Member of the Responsible Business Alliance (RBA), **XX** fully supports the vision and goals of the RBA:

#### ***Vision:***

A global electronics industry that creates sustainable value for workers, the environment and

business.

***Mission:***

Members, suppliers and stakeholders collaborate to improve working and environmental conditions through leading standards and practices.

**2. For Affiliate Members**

As an Affiliate Member of the Responsible Business Alliance (RBA), **XX** fully supports the vision and goals of the RBA:

***Vision:***

A global electronics industry that creates sustainable value for workers, the environment and business.

***Mission:***

Members, suppliers and stakeholders collaborate to improve working and environmental conditions through leading standards and practices.

**XX** commits to progressively align its own operations with the provisions of the RBA Code of Conduct and to support and encourage its own first-tier suppliers to do the same.

Wherever possible, **XX** will seek to adopt the RBA approach and tools in practical ways in the spirit of the industry's common goals.

**3. For Regular Members**

As a Regular Member of the Responsible Business Alliance (RBA), **XX** fully supports the vision and goals of the RBA:

***Vision:***

A global electronics industry that creates sustainable value for workers, the environment and business.

***Mission:***

Members, suppliers and stakeholders collaborate to improve working and environmental conditions through leading standards and practices.

**XX** commits to comply to the RBA Code of Conduct in its own operations, progressively implementing the RBA approach and tools in the spirit of the industry's common goals.

**XX** also commits to progressively apply the RBA Code of Conduct to its first tier suppliers, to monitor its application to the best of its ability using RBA practices and tools, and to encourage and support its suppliers to do the same.

**4. For Full Members**

As a Full Member of the Responsible Business Alliance (RBA), **XX** fully supports the vision and goals of the RBA:

***Vision:***

A global electronics industry that creates sustainable value for workers, the environment and business.

***Mission:***

Members, suppliers and stakeholders collaborate to improve working and environmental conditions through leading standards and practices.

**XX** commits to comply to the RBA Code of Conduct in its own operations, progressively implementing the RBA approach and tools in the spirit of the industry's common goals.

**XX** also commits to progressively apply the RBA Code of Conduct to its first tier suppliers, to monitor its application to the best of its ability using RBA practices and tools, and to encourage and support its suppliers to do the same.



## Appendix 4 - Full Member Checklist

### CHECKLIST FOR RBA FULL MEMBERS

SEND INQUIRIES TO [COMPLIANCE@RESPONSIBLEBUSINESS.ORG](mailto:COMPLIANCE@RESPONSIBLEBUSINESS.ORG)

#### PUBLIC COMMITMENT – MEMBER REQUIREMENTS



	Provide company code of conduct to RBA. Additionally, provide RBA with proof or documentation of how your Code incorporates the entire RBA Code of Conduct and map how it meets or exceeds the entire RBA Code of Conduct.
	Member companies must communicate the RBA Code of Conduct to their entire supply chain. Please provide RBA with documentation and a sample of supplier communication and acceptance (master agreement, letter of commitment, formal acceptance etc.).
	Send copy of corporate commitment to RBA, which must be signed by CEO or CEO minus one (if not already on file with RBA from initial joining).

#### RISK ASSESSMENT, AUDIT AND SHARING REQUIREMENTS



	Member to complete Corporate SAQ in RBA-ONLINE. This is an annual requirement. Results must show low-risk on the Corporate SAQ for Full membership.
	Ensure applicable owned facilities and/or major suppliers are listed in RBA-ONLINE, or otherwise submit to RBA a list of major suppliers and/or applicable owned facilities (upload to member's RBA-ONLINE account as an attachment).
	Submit RBA facility SAQs in RBA-ONLINE for applicable owned facilities and/or major suppliers or provide "Equivalent" risk assessment as an attachment in RBA-ONLINE).
	Complete a VAP Audit or a 3 <sup>rd</sup> Party, full-scope AMA/CMA on 25% of high-risk major suppliers and/or applicable owned facilities. These must include all lines of business at the factory in which the audit was conducted.
	Ensure that all AMA/CMA audits submitted for member compliance are imported into RBA-ONLINE, via the standard audit upload process, or in special cases, as an attachment.
	Commit to accepting VAP audits less than 18 months old, with noted exceptions (see FAQ).
	Complete 3 <sup>rd</sup> Party VAP/AMA/CMA to close out all "Disqualifying" Priority findings (see FAQ) and make the closure audit(s) available in RBA-ONLINE.
	Use RBA-ONLINE to share at least 5% of high risk major supplier audits or no less than 1 audit, whichever is greater. If all your high risk suppliers have already been audited by other members and are available in RBA-ONLINE, and staff can verify that 25% of high risk have been audited, you have met the sharing requirement. If there are no sites identified as high risk through the RBA risk assessment process, this is not applicable.

#### REPORTING, INCLUDING CSR REPORTING



	Publish corporate responsibility data on a cadence that demonstrates commitment to the RBA Code of Conduct and provide link to RBA to the publicly available corporate responsibility data. This should include at a minimum: description of commitment and engagement with RBA and compliance to the RBA requirements, consolidated audit results, and overall progress in CSR. (A GRI report is acceptable).
	Complete and submit the RBA Member Compliance Template twice annually, in July (for the mid-year report) and January (for the end of year report).