Incident Management Process Flow

- **Receives Credible Inquiry**
  - Possible Code Violation
    - Yes
      - Affiliate or Supporter Member?
        - Yes
          - Encourage Member to investigate & offer support
        - No
          - Notify Member
    - No
      - **If VAP/SVAP shows no confirmation of allegations, RBA absorbs cost of audit, otherwise auditee is responsible for cost**

- **Check Membership Status**
  - Regular/Full or Supplier to Regular/Full
    - Yes
      - Require documentation of actions to date
      - Require Audit* if needed
    - No
      - Notify Member

- **< 3 business days**
  - **Yes**
    - Close Allegation?
      - Yes
        - End
      - No
        - Require Audit* if needed
        - Notify Member
  - **No**
    - End

- **< 45 days**
  - **Yes**
    - **RBA Closure Audit**
      - End
    - **No**
      - No action required for member compliance
      - **Work with member/supplier on CAP**
      - Notify member
      - End

- **Closure timelines aligned with most recent version of the VAP Operations Manual**

**Notes:**
* Multiple inputs go into the RBA determination of confirmation of allegations

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*If VAP/SVAP shows no confirmation of allegations, RBA absorbs cost of audit, otherwise auditee is responsible for cost*
The OECD has an expectation of business leverage and a framework for companies to follow to help define where their responsibilities are focused. In the event of a membership compliance issue (using the OECD Framework as a model) the RBA expects the following steps of members found to have confirmed Priority Non-Conformance in their supply chain.

<table>
<thead>
<tr>
<th>STEP #1 Create a Plan</th>
<th>STEP #2 Monitor Improvement</th>
<th>STEP #3 Engage others</th>
<th>STEP #4 Accountability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Together with the supplier, develop and implement a Corrective Action Plan to prevent, or mitigate, actual or potential adverse impacts of the conditions outlined in the audit non-conformance</td>
<td>Monitor improvement during continuation of the relationship and if necessary; temporary suspension of the relationship while pursuing ongoing risk mitigation</td>
<td>Set the expectation that the member will attempt to influence the situation through “another entity” or “collaborative action” and increase leverage through shared remediation with other customers</td>
<td>After failed attempts at mitigation, or where the enterprise deems mitigation not feasible, or because of the severity of the adverse impact, disengagement* with the supplier.</td>
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</tbody>
</table>

- Disengagement is discouraged by the RBA and should not be taken lightly, as improvement is preferable, but lack of disengagement results in drop of membership level to Affiliate.
- It should be considered only as a last resort and used in the case of refusal to cooperate or lack of meaningful progress after 6 months.