MARS

Supplier Code of Conduct Guidebook

A practical guide on how to bring the Mars Supplier Code of Conduct to life in the workplace.

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Mars has been proudly family owned for over 100 years. It's this independence that gives us the gift of freedom to think in generations, not quarters, so we can invest in the long-term future of our business, our people and the planet — all guided by our enduring Principles.

We believe the world we want tomorrow starts with how we do business today. Our bold ambitions must be matched with actions today from our more than 115,000 Associates in 80 countries around the world.

Our Sustainable in a Generation plan is a key way in which we are taking action. This plan sets out our commitment as a business to grow in a sustainable way while delivering positive social and environmental impacts, and features ambitious goals informed by science and rooted in The Five Principles.

Our Sustainable in a Generation Plan focuses particularly on the way in which we source our goods and materials globally. We know that our most significant social and environmental impacts occur in our supply chains, that's why our first-tier suppliers around the world are important partners on our sustainability journey.

A critical first step in this journey is ensuring our first-tier suppliers are also addressing sustainability in their workplaces. Since 2011, we have made our social, environmental and ethical performance expectations of our suppliers known through our Supplier Code of Conduct. In sharing our Code of Conduct we align our suppliers with our standards and ensure that we work with partners that share our beliefs.

Our Supplier Code of Conduct also serves as the foundation of our Next Generation Supplier program; a three element approach that ensures our suppliers understand and meet our code expectations, while engaging with and supporting suppliers as they implement improvements to their sustainable business practices and on-site working conditions.

When sharing our code we appreciate that our suppliers may need additional support and guidance; such as how to implement robust systems and processes that uphold our code expectations, or improve existing processes to ensure they are most effective. To support with these efforts, we have created this guidebook, which provides examples of effective management systems that if implemented strengthen a company's ability to operate in a sustainable way and prevent or resolve social, environmental and ethical issues at the workplace.

We hope that you find this guidebook a useful tool in understanding our code and implementing improvements within your operations.

Thank you,

Mars Next Generation Supplier team.

HOW TO USE THIS GUIDEBOOK

WHAT IS THE PURPOSE OF THIS GUIDEBOOK?

The Guide contains examples of management systems that if applied can strengthen a suppliers ability to manage the risk of social, environmental & ethical issues occurring at the workplace.

This guidebook **does not** constitute a new set of requirements, it is resource that suppliers can leverage to gain a deeper understanding of how to tackle sustainable challenges, and more closely align with the expectations contained within our code.

The Guidebook is designed to serve as a resource tool for suppliers to:

- Evaluate the policies and procedures they have in place.
- Identify potential areas of risk.
- Evaluate how the controls may or may not be working and adjust them as needed.

WHO IS THIS GUIDEBOOK FOR?

Both this guidebook and our Supplier Code of Conduct have been created as a resource for our first-tier suppliers. This is defined as all third parties with whom Mars has active commercial relationships for the supply of goods or services.

HOW IS THIS GUIDEBOOK ORGANIZED?

Each chapter starts with a short introduction, relevant definitions, and a description of the types of potential challenges suppliers may encounter. The remainder of each chapter describes various management systems and processes which can assist suppliers to identify and assess the risk of issues, and help to align with the expectations contained in the Code of Conduct.

USING A MANAGEMENT SYSTEM APPROACH TO ADDRESS COMMON RISKS

Each chapter contains five key sections which list system elements and potential risk controls. Implementing these can enable a supplier to be proactive, anticipate problems and identify and address the root causes of issues.

These sections are as follows:

- **Policies**. Written commitment statements for what the supplier wants to achieve.

- **Procedures**. Who does what, and how, as part of a supplier's day-to-day operations. The control aspect of a procedure is specifically designed to address identified risks.

- **Communication and Training**. Individuals with implementation roles need to be trained on the procedures required to effectively achieve the supplier's policy commitments.

- **Documentation & Records**. Document procedures that are performed consistently, and formal records that can demonstrate compliance with both Mars expectations and legal requirements.

- **Monitoring**: Routinely observing or reviewing the effectiveness of a process or procedure to identify actual or potential risks to people, the environment and the business.

- **Corrective Action and System Review:** Evaluating risks for root cause(s) and then taking corrective and preventive action to address lower the risk and/or prevent a recurrence.

WHAT IS THE ORIGIN OF THE EXPERTISE AND GUIDANCE CONTAINED WITHIN THIS GUIDEBOOK?

This guidebook has been created with the support of our Global Strategic Human Rights partners Verité and serves as a companion to our Supplier Code of Conduct.

Throughout the document a number of helpful definitions are provided that explain the various terms used. Some of these definitions are universally applied and standardized, such as the definition for Child Labor as defined by the International Labor Organization. Where this type of definition is used the relevant source is cited underneath.

Other terms which do not have a universally accepted definition have been defined by the authors of this guidebook Verité and therefore do not include a separate citation. These definitions are based upon Verité's expertise and experience as a global thought leader on labor rights, in line with their understanding of the way in which these terms are typically used, and the most effective means of explaining them.

MANAGEMENT SYSTEMS

The concept underlying a social, environmental and ethical management system is the same as any other business management system: well-defined management processes linked together to enable an organization to implement its policies and reach its performance goals. While the components of such systems can be described in different ways, probably the best and most well-known model is "Plan-Do-Check-Act" or PDCA. This chapter describes how Mars suppliers can implement a management system approach to achieve sustainable compliance with the Responsible Supplier Code of Conduct, and reduce the risk of issues occurring.

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems.

Some examples of this practice include:

- Establish clear policy commitments to meet legal and performance standards aligned with customer Codes.

- Understand the risks that could get in the way of meeting these standards.

- Establish processes and procedures to address the identified risks.

- Assign responsibility for implementing procedural and operational controls.

- Train workers and managers on their roles and responsibilities.

- Routinely check to make sure that everything is working is planned and address any identified problems.

- Undertaking due diligence of suppliers of on-site services and workers to ensure they follow Code and legal requirements.

- Perform reviews of overall system effectiveness.

HELPFUL DEFINITIONS

A management system is how a supplier gets things done. It is made up of interdependent policies, processes, and procedures organized to enable a supplier to achieve its business objectives (quality products, on-time delivery, profitability) and meet code of conduct expectations.

A policy is a statement of commitment to what the supplier believes in and how they intend to uphold these beliefs. For example, "our company will manage our workplace and supply chain in full alignment with the UN Guiding Principles on Business and Human Rights."

A process is a major part of the system, consisting of a set of actions that together make up a business function. For example, the recruitment, selection and hiring process is designed to hire the right person for the job at the right time.

Procedures are step-by-step descriptions of how a job or task within a process is done; by whom and when. For example, a procedure to verify the age of a job applicant is part of the recruitment process.

Finally, a risk control is an extra procedural step or physical improvement made to reduce or eliminate the possibility of an unintended outcome. For example, validating the authenticity of an applicant's proof of age documentation controls for the risk of hiring an underage worker.

EXAMPLES OF ISSUES SUPPLIERS MAY ENCOUNTER

The following are examples of the types of issues that suppliers may encounter in meeting the Mars Code of Conduct expectations for management systems:

- Failure to assign responsibility for overall system effectiveness and for implementation of specific procedures.

- Failure to assess the performance of vendors and service providers.

- Workers unaware of supplier policies and or the protection afforded them by applicable laws and regulations.

- Actual or suspected infractions of laws and regulations go undetected and uncorrected.

- Appropriate actions not taken to prevent the recurrence of human rights, health & safety, environmental, or corruption and bribery issues.

- Management is unaware of the performance of the supplier relative to internal standards, or customer and legal requirements.

WHAT DOES A MANAGEMENT SYSTEM LOOK LIKE?

A well-designed management system is one way to identify, evaluate and reduce human rights, environmental and business ethics risks. Whether formal or informal, a supplier's management system should support its productivity and growth, ensure conformance of its own operations and that of its suppliers and vendors to labor, environmental, health & safety and business ethics laws and customer requirements, and is the key to a stable and sustainable workplace.

What is Supply Chain Due Diligence?

The most common way for an organization to understand and address human rights, environmental and ethics issues in its supply chains is to undertake supply chain due diligence. This risk management process is designed to identify, prevent, and mitigate adverse human impacts and other risks in the operations of suppliers and vendors in all tiers of the supply chain.

The process includes four key steps: assessing actual and potential impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed.

For the best results, due diligence should be initiated as early as possible in the development of a new business relationship, given that risks can be most effectively addressed at the stage of selecting vendors and suppliers and in structuring contracts.
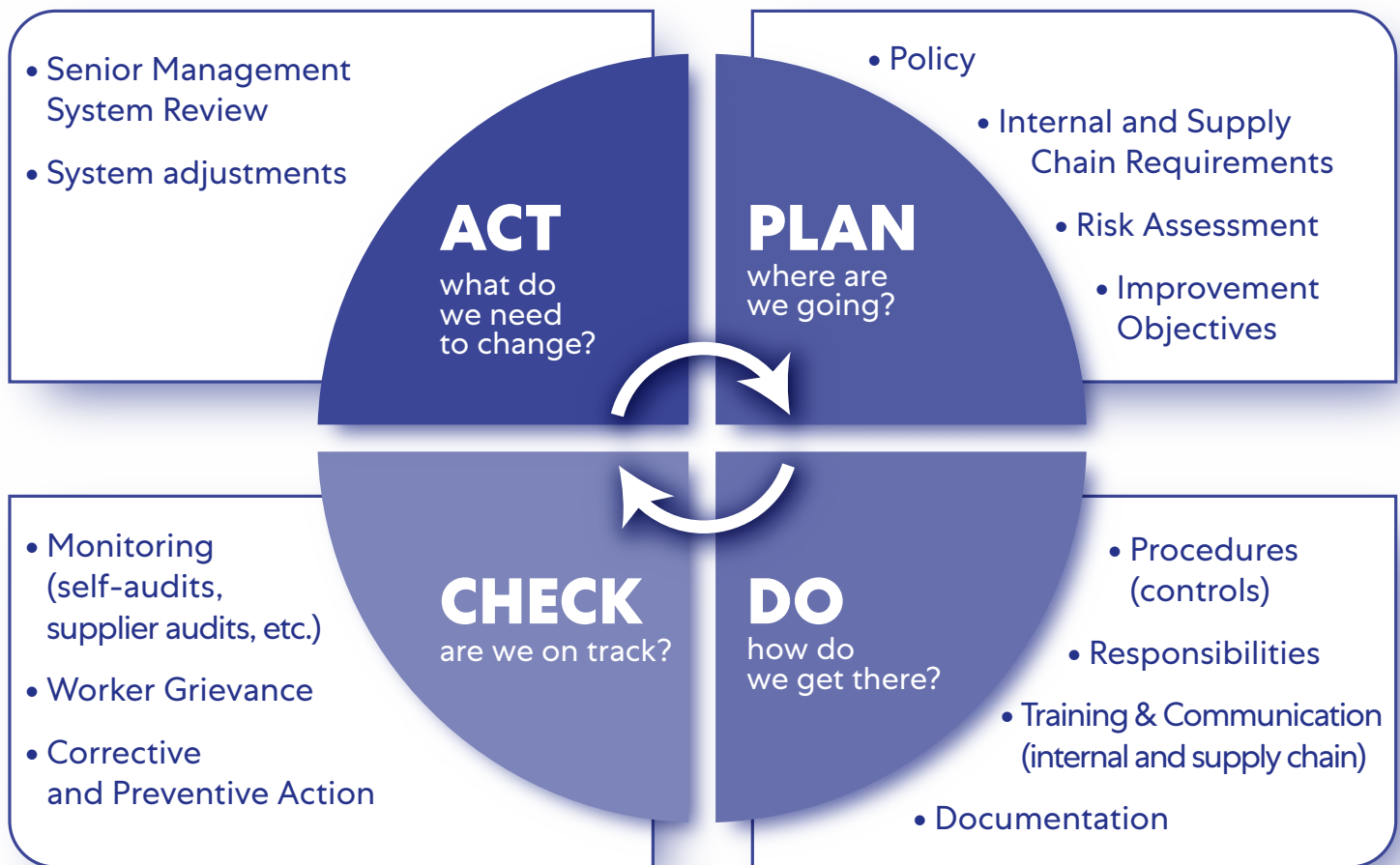
Mars encourages its first-tier suppliers to implement this approach with their suppliers and vendors, including those providing on-site services and workers.

There are many different system models in use, but for the purposes of this guidebook we will not prescribe a specific type, especially for suppliers that have one in place already. Instead, we will recommend a flexible Systems Approach, using the simplicity of the most widely recognized system model, Plan-Do-Check-Act.

Businesses of all sizes should have a management system!

Although it need not be in written form, its goals and procedures should be broadly communicated to everyone and regularly reinforced so that there is consistency in the way things are done - from day to day andmonth to month.

ACT what do we need to change?

- Senior Management System Review
- System adjustments

PLAN where are we going?

- Policy
- Internal and Supply Chain Requirements
- Risk Assessment
- Improvement Objectives

CHECK are we on track?

- Monitoring (self-audits, supplier audits, etc.)
- Worker Grievance
- Corrective and Preventive Action

DO how do we get there?

- Procedures (controls)
- Responsibilities
- Training & Communication (internal and supply chain)
- Documentation

Each of the following sections present the PDCA system elements that a supplier should develop or strengthen to reduce the risk of problems arising. This is achieved by anticipating issues before they appear, as well as addressing or eliminating issues that have arisen by tracking them back to their root cause.

PLAN
where are we going?

As stated in the PDCA diagram, the purpose of the "Plan" part of the cycle is to assess the supplier's goals in terms of human rights, EHS and business ethics performance, and to understand the rules it should follow and the potential obstacles in its path.

Policy: Policies are written commitment statements for what the supplier wants to achieve related to labor, environment, health & safety, and business ethics.

To make sure everyone knows the goal, suppliers should have written statements of commitment to legal compliance and social responsibility standards which are aligned with the Mars Supplier Code of Conduct, and implement continuous improvement.

This includes:

- ☑ Commitment to Code and legal compliance and continuous improvement.
- ☑ Endorsed by senior management.

Requirements: The next step in a management system is to know what is expected. Suppliers should track and understand applicable laws, regulations and customer requirements, such as the Mars Supplier Code of Conduct, and to keep that information up to date.

Risk Assessment: Risks are conditions and practices that can impair a supplier's ability to achieve its policy commitments. For example, a high rate of poverty in the community could lead to underage job applicants. A supplier

EXAMPLE OF RISK AND CONTROLS

Process:
Recruitment, Selection and Hiring

Risk:
Unlawful Discrimination in hiring

Controls:
- Non-discrimination policy communicated to third party recruitment agents

- Job advertisements that list job qualifications, not personal characteristics, such as gender, race, age, or sexual orientation.

- Recruitment staff trained to use objective interviewing techniques and objective selection criteria.

should evaluate its operations in light of such risks and, at a minimum, evaluate operations of those of its suppliers and vendors of on-site services and workers for such risks and establish process controls to mitigate them.

Improvement Objectives: In order to achieve the policy commitment to continuous improvement or to establish or improve process controls, a supplier should establish improvement objectives and targets, and to track their achievement over time.

✓ DO
how do we get there?

This is the "how do we get there?" phase of the management system. Working from the risk assessment, and an understanding legal and customer requirements, a supplier should create process controls and the organization structure needed to implement them.

Procedures (Controls). Procedures describe the 'what,' 'how' and 'who' of how the supplier does things – the supplier's business practices. Procedural and physical controls need to be put in place to mitigate risks and implement the supplier's policies. This includes:

- ☑ Creating new procedures or revising existing ones to prevent unintended outcomes and Code noncompliance. For example, a procedure to periodically inspect and maintain machine guarding to prevent injuries.
- ☑ Installing physical controls to prevent environmental impacts, such as secondary containment in chemical storage areas to prevent groundwater contamination from leaks of hazardous substances.

Responsibilities. Once a supplier has established what it should do, it should assign responsibility for effective implementation. That begins with assigning a senior manager with overall accountability for achieving the supplier's policy goals. Then implementation of specific system processes and procedures can be assigned to responsible individuals, such as implementing the timekeeping process, performing routine maintenance on air pollution control equipment or assessing a supplier's performance against the Mars Supplier Code of Conduct.

Training and Communication. Individuals with implementation roles need to be trained to

> ### What Makes a Good Procedure?
>
> A procedure is a set of instructions to help ensure that a given task or job is performed consistently and according to standards.
>
> A good procedure describes the tasks that need to be performed; how they are to be done; by whom; and when or how often.
>
> It can be a formal document or a simple list of instructions with illustrations, printed on a card and mounted to a machine or workstation.

know how to do their jobs effectively, and all employees should be told who is responsible for specific processes, so they know where to go with their questions and concerns. They should also receive regular communication about their rights and responsibilities under the law.

It is important for suppliers and vendors providing workers on-site to understand the requirements of the Mars Code and how to implement or improve their practices to align them with the Mars Code. At a minimum, requirements should be communicated in contracts, purchase requisitions and service agreements. Compliance assistance in the form of training and consultation should be provided as needed.

Documentation.
To make sure that procedures are performed consistently, regardless of staff changes, it is important to document them, and to keep formal records of other items can help verify procedures conform with the Mars Code and legal requirements. This includes copies of regulatory permits, self-inspections and audits, and other system records.

Checking is a way to make sure that processes and procedures are on track and correct any identified problems.

It involves using continuous monitoring (such as process KPIs and emissions monitoring), worker feedback processes, incident investigations, and routine self-assessments and audit.

Monitoring means observing or reviewing the progress or effectiveness of a process or control. Examples include:

☑ Establishing KPIs for key processes for which routine monitoring is essential. This could include tracking the percentage of corrective actions completed on time or the number of employees working more than 60 hours per week.

☑ Measuring training effectiveness both immediately after training by testing knowledge and skills, and weeks or months later by assessing behavior change.

☑ Utilizing continuous monitoring equipment to monitor the level of airborne contaminants in the workplace or the quality of discharged wastewater.

☑ Conducting routine self-assessment or self-audits to examine if the management system processes and procedures are achieving the desired results.

☑ Evaluating on-site labor supplier and vendor performance in meeting Mars Code expectations.

Worker Grievance. Obtaining and regularly reviewing worker grievances and other feedback is an essential tool for management to monitor the impactof human resources processes. Every supplier should have an easy to access, trusted, and confidential way for employees to report concerns.

Corrective and Preventive Action. When monitoring identifies an actual or potential uncontrolled risk, the supplier should evaluate how and why it occurred, with the goal of identifying the root cause(s).

The task then is to determine the appropriate corrective and preventive actions that will address the immediate issue and prevent a recurrence. Corrective and preventive actions should be assigned to specific owners to be completed within a designated timeframe.

In addition to being accountable for the achievement of the Supplier's policy commitments, the Supplier's senior management is also responsible for leading a regular review of the management system.

This includes an evaluation of:

- ☑ Suitability of the current policy(ies). Has anything changed internal or external to the supplier that would require revising the policy?

- ☑ Achievement of objectives. Is the supplier on track for, or have they achieved their improvement objectives? If now, why not, or if yes, should the supplier go for further improvement?

- ☑ Status of corrective action plans. Has the supplier and their on-site labor suppliers and vendors addressed all identified issues? If not, does it require more resources or other change in approach? Are they seeing recurrences of the same issue(s)?

- ☑ Self-assessment and audit findings. Do the results of process and system evaluations indicate that the supplier's risk controls are having an impact? If not, where is further improvement needed?

- ☑ Regulatory agency inspections. Do governmental inspections validate the supplier's compliance efforts or are there weaknesses the supplier should address?

- ☑ Employee engagement. Do the results of worker survey and interviews, and a review of grievance reports indicate ongoing issues related to workplace practices? If so, what should be done to address the issues?

Finally, the results of the Supplier's Management Review (minutes, action items, etc.) should serve as the basis for the next year's "Plan" cycle.

Click here for additional resourses

CHILD LABOR

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems related to Child Labor.

HELPFUL DEFINITIONS

A child is an individual below the age of 18.

The minimum age for employment as defined by the International Labour Organization (ILO) is the age for completion of compulsory schooling or 15 years, whichever is higher. Some countries with developing economies have specified a minimum age of 14.

Child labor is work performed by children that:

- is mentally, physically, socially or morally harmful to children, and
- interferes with their schooling

A young worker is a child between the minimum age for work and age 18.

An intern is a student worker in a short-duration, structured program undergoing supervised practical training to explore job options and learn skills or competencies in their field of study.

An apprentice is a worker in a training program that combines vocational education with work-based learning to obtain intermediate occupational skill or licensing.

A student worker is a worker, regardless of age, who is enrolled in a program at an educational institution and employed by supplier for a work placement to support learning that is arranged by the educational institution.

As defined by the International Labor Organization Convention C182[1], the worst forms of child labor include:

- All forms of forced and bonded labor and human trafficking.
- Hazardous work which, by its nature, is likely to harm the health, safety or morals of children.

EXAMPLES OF ISSUES SUPPLIERS MAY ENCOUNTER

- Inadequate process for verifying the age of job applicants.
- Young workers are assigned to work at night, at hazardous jobs, or overtime work.
- Student workers are not in jobs that support their course of study.
- Remediation of a child found working in the workplace includes only removal of the child, resulting in greater risks to the child.
- Children employed by on-site services providers.

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1) https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXP

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements may enable suppliers to better address the risk of child labor within the workplace, and help to meet the expectations contained in the Mars Supplier Code of Conduct:

- ☑ A clear and detailed policy prohibiting child labor.
- ☑ Procedures and accountability for establishing and maintaining compliance with laws and regulations related to child labor and the young workers.
- ☑ Training for management and workers on the child labor policy and procedures, including verifying the age of job applicants.
- ☑ Documentation of procedures to protect the young workers.
- ☑ Ways to monitor that underage job candidates are not hired and the young workers are not assigned to dangerous work or overtime.
- ☑ Periodic management level review of how effectively the overall system is performing.

The following sections provide a list of system processes, starting with the clear policies that are the foundation of Planning.

(Source: Global Estimates of Child Labour, ILO 2017)

ℹ️ POLICIES

Supplier's company policies may include:

- ☑ Only individuals above the minimum age of employment will be hired.

- ☑ Compliance with applicable child labor laws concerning wages, working conditions, and hours of work.
- ☑ Young workers will not be assigned to night work, overtime work, or any work that is mentally, physically, socially or morally dangerous.
- ☑ Working hours and job responsibilities will not interfere with a child's educational requirements.
- ☑ Measures will be taken to prevent harm to children from activities in the workplace, housing or transport.
- ☑ If a child is found in the workplace, the situation will be remediated with the best interests of the child and his or her family in mind.

✏️ PROCEDURES

The following procedures are examples of practices which would enable a supplier to implement the policies noted above:

- ☑ An objective procedure to verify the age of all job applicants.
- ☑ Procedure to objectively verify the age of all job applicants using government-recognized documents wherever possible.
- ☑ Methods to verify the authenticity of proof-of-age documentation.
- ☑ A way to classify jobs in the workplace with health and safety hazards that are not suitable for the young workers.
- ☑ A procedure to ensure that student workers are only assigned to jobs that support their course of study.

☑ Process to ensure that young workers are provided with regular health examinations and other legally-required protections.

☑ Ways to ensure that young workers and children are protected from harm, exploitation or abuse by worker activities in the workplace, or in supplier-provided housing or transport.

☑ Establish a process to remediate cases of children discovered working in the workplace that provides for the welfare of the child.

COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, suppliers should assign responsibilities for implementation of their policies and procedures and train responsible staff on their roles. Examples include:

☑ Provide initial and periodic training for recruitment and hiring staff on the supplier's policies and procedures, and legal requirements on child labor prevention.

☑ Communicate the supplier's child labor policy to any third parties that provide recruitment services on the supplier's behalf.

☑ Make sure that job descriptions and job advertisements state the minimum hiring age.

☑ Display supplier policy and local laws and regulations on child labor in the language(s) that all workers understand.

☑ Train supervisors and managers on the supplier's child labor policies and procedures, including safeguarding children from harm, exploitation or abuse, and what to do if they learn of an underage worker in the workplace.

☑ Communicate the supplier's child labor policy and performance requirements to on-site contractors and service providers.

Available e-Learning Courses on Child Labor Prevention

A variety of e-learning courses and classroom presentation materials are available online for suppliers. One of the more in-depth offerings, called "Eliminating Child Labour," is provided by the International Labor Organization (ILO) and can be found at:

www.ilo.org/legacy/english/ipec/elearning_labourinspectors_and_clmonitors/module_1/multiscreen.html

DOCUMENTATION & RECORDS

It is recommended that key procedures are documented whenever possible to ensure they are followed consistently. The following are examples:

☑ Copies of proof of age documents provided by job applicants.

☑ An inventory of jobs and tasks that cannot be assigned to the young workers because of inherent health and safety hazards.

☑ A register of young workers.

☑ Young worker health examination records.

☑ Records of actions taken upon the discovery of an underage worker.

☑ Copies of job advertisements and employment contracts that specify the minimum age of hire and any restrictions in working hours and job tasks for the young workers.

☑ Records of self-assessments and other evaluations of conformance to the supplier's child labor policies and procedures and compliance with applicable legal requirements.

🔍 MONITORING

To evaluate and improve the impact of the program, suppliers should routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

☑ Regular verification of the validity and completeness of proof of age records to verify that procedures are being properly followed or a need to make process improvements.

☑ Conversations with recruitment staff members to ensure they understand how to verify the age of job applicants and identify falsified documents.

☑ Assess the frequency and nature of the young worker complaints and grievances related to their treatment in the workplace, and company-provided accommodation or transport.

☑ Regularly review the young worker job assignments to check that restrictions on the job type and working hours meet supplier requirements.

☑ Perform random age verification checks, as needed, to ensure the effectiveness of recruitment procedures.

🔍 CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, the supplier should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process includes:

☑ Conducting root cause analysis of any issues uncovered during monitoring.

☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.

☑ Assigning task owners, milestones, and completion dates.

☑ Monitoring that changes in procedures have been made and that they produce the desired result.

☑ Conducting ongoing periodic senior management reviews for overall system effectiveness.

Click here for additional resourses

COMPENSATION AND BENEFITS

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems related to Compensation and Benefits.

RELEVANT DEFINITIONS

Regular or base wage is what is paid to workers for their regular work hours. This rate is usually a legal minimum wage set by the government or an industry benchmark wage and should be specified in the workers' employment contracts.

Hourly rate is the amount of money paid for every hour worked. It is the monthly wage divided by the number of regular work hours.

Piece rate is the rate paid for a set number of units of work produced or harvested. Regardless of the methods used, workers' income should not fall below the legal minimum wage or local industry benchmark.

Regular work hours are hours worked during the normal workday. Local law will usually set the limit of regular hours between 40 and 48 per week.

Overtime hours are those exceeding the regular work day or work week.

EXAMPLES OF ISSUES SUPPLIERS MAY ENCOUNTER:

- Overtime is not paid at the rate specified by applicable law.
- Piece rate workers do not receive at least minimum wage, regardless of hours worked.
- Unauthorized or illegal withholdings from wages.
- Disciplinary wage deductions and fines.
- Information on pay slips does not match payroll records.
- Legally required allowances, bonuses or benefits not paid.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements may enable suppliers to ensure workers are fairly compensated, and help to meet the expectations contained in the Mars Supplier Code of Conduct:

- ☑ A clear and detailed commitment to paying legal wages and benefits in the supplier's policy
- ☑ Procedures and accountability for establishing and maintaining compliance with laws and regulations related to compensation and benefits.
- ☑ Training for management and workers on the compensation and benefits policy and procedures, including on the implementation tasks associated with specific jobs.
- ☑ Documentation of all wage and social benefits payments.
- ☑ Ways to monitor that all employees are being paid at least the legal minimum or industry benchmark wage and legally-mandated social benefits.
- ☑ Periodic management level review of how effectively the overall system is performing

The following sections provide a list of suggested system processes, starting with policies that are the foundation of Planning.

ⓘ POLICIES

Supplier's company policies may include:

- ☑ Workers are paid at least the minimum or industry benchmark wage.

- ☑ Piece rate workers are paid at least the legal minimum wage for all the hours they work, regardless of production quotas.

- ☑ Work performed beyond regular hours, on rest days and legal holidays is paid at the required legal rate.

- ☑ Legally required overtime pay, benefits and social insurance are included as part of workers' total compensation package.

- ☑ Paid annual leave, sick leave, maternity leave, legal holidays and any other legally-required leave is provided.

- ☑ Workers are paid on time and in full each pay period.

- ☑ Wage deductions for disciplinary reasons are not allowed, including production errors, not following work procedures, or loss or damage of materials or equipment.

✏ PROCEDURES

The following procedures are examples of practices which if implemented may enable a supplier to deploy the policies noted above

- ☑ A payroll system that is both accurate and transparent.

- ☑ Methods to ensure that hourly and piece rate workers' employment agreements clearly state the wage rates they will earn for regular and overtime work, the pay period and frequency of payments, and any legally-required benefits and deductions.

- ☑ A way to make sure all workers receive understandable pay slips that detail hours worked, regular and overtime wages, benefits, and deductions.

- ☑ Regular monitoring of the practices of any third party that is responsible for paying contract worker salaries and benefits.

- ☑ A process that limits the length of time workers can be kept on trainee, apprentice or probationary status before they are promoted and paid the wages and benefits of regular workers.

- ☑ A process that ensures workers are paid on time (not more than one week after the end of the pay period) and in full.

- ☑ Payment methods that include cash, check, or direct deposit into the worker's bank account. If bank accounts are set up by the factory for workers, only the workers may access and control the accounts.

- ☑ Methods to ensure that regular and probationary workers receive the same compensation and benefits, where required by law.

- ☑ Methods to ensure workers receive legally required social security, insurance or medical benefits.

A clearly defined and communicated formula for wage calculation for all types of work, including:

- Overtime wages for extra hours worked on regular work days.

- Special overtime wages (higher premium) for work on a rest day, vacation day or legal holiday.

- Piece work rates, including how production quotas were determined.

Suggested Practice

The pay slip provides the worker with a record and "receipt" of payment for work performed over a specified period.

It should specify the hours worked, base wage rate, overtime hours and overtime premium rate, and piece rate, if applicable.

COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, suppliers are encouraged to assign responsibilities for implementation and train responsible staff on their roles. Examples of such practices include:

☑ Provide initial and periodic training for managers and supervisors and newly hired workers on the supplier's policies and procedures, and legal requirements on wages and benefits.

☑ Train workers on how their wages are calculated, including wage rates, benefits and legally-required deductions.

☑ Communicate the pay and benefits structure to all workers before they begin work and whenever changes are made.

☑ Display supplier policy and local laws and regulations on wages and benefits in the language(s) that all workers understand.

☑ Communicate Code expectations for compensation and benefits to all providers of contract labor and on-site services contractors.

Suggested Practice

Train supervisors and HR staff to understand pay equals time worked. This means any supplier-required activity, such as briefings, daily meetings, trainings, or work team meetings, should be paid equal to the time of the mandatory attended activity. And if the activity occurs outside regular working hours, that it is paid at the overtime rate.

DOCUMENTATION & RECORDS

It is recommended that procedures are documented whenever possible to ensure they are followed consistently. The following are examples of such practice:

☑ Payroll and time records (preferably computer-generated) based on an accurate electronic recording of hours worked for all workers.

☑ Pay slips showing timely wage payment provided to workers in their native language that contain at least the following details:

☐ **Pay period**	☐ **Benefits** (for example: accrued leave time, sick time used, etc.)
☐ **Regular hours worked**	☐ **Bonuses**
☐ **Overtime hours worked**	☐ **Gross earnings**
☐ **Regular wages**	☐ **Deductions** (for example: social insurance and other agreed amounts)
☐ **Overtime wages**	☐ **Net wages**

☑ Copies of receipts from government agencies and others that verify payment for social insurance and other worker benefits.

☑ Copies of worker offers of employment and employment contracts that specify the base wage and overtime rates, regular work hours, and the schedule of wage payments.

☑ Record of all changes in employment status and corresponding changes in wages and benefits in workers' individual files.

Suggested Practice

An electronic timekeeping and payroll system that automatically calculates wages based on hours worked is preferred over manual or handwritten systems for the following reasons:

- Accuracy
- Objectivity
- Consistency across departments or work units
- Ability for workers to verify their hours worked and wages

☑ Interview workers who leave the supplier to determine if their departure is linked to dissatisfaction with compensation and benefits.

☑ Survey workers on a regular basis to identify and address issues related to dissatisfaction with the calculation or payment of compensation and benefits, including pregnancy, maternity and lactation benefits.

☑ Regularly evaluate the performance of labor contractors and on-site services providers to ensure they are meeting Mars expectations for compensation and benefits.

🔍 MONITORING

To evaluate and improve the impact of the program, it is recommended that suppliers routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

☑ Routine evaluation of the accuracy and completeness of time records and wage calculations, paying particular attention to:

    ☑ Errors in documentation, record keeping, or calculation on the part of the payroll clerk or payroll department staff.

    ☑ Inadequate knowledge of payroll and benefits staff members regarding policies and procedures, including how to calculate and record worker compensation.

☑ Assess the frequency and nature of worker complaints and grievances related to errors in the calculation or payment of their wages and benefits.

🔍 CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, suppliers are encouraged to undertake immediate corrective and preventive actions, as well as periodic system reviews. This process includes:

☑ Conducting root cause analysis of any issues uncovered during monitoring.

☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.

☑ Assigning task owners, milestones, and completion dates.

☑ Monitoring that changes in procedures have been made and that they produce the desired result.

☑ Conducting ongoing periodic management reviews for overall system impact.

Click here for additional resourses

DISCRIMINATION

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems related to Discrimination.

DEFINITIONS

Discrimination[2] is defined by ILO Convention 111 as making a distinction, exclusion or preference based on race, color, sex, religion, sexual orientation, political opinion, national extraction or social origin (among other characteristics) with the effect of nullifying equality of opportunity and treatment in employment. Discrimination can be deeply rooted and can lead to an underclass of workers who lack opportunities to develop and improve.

Harassment is defined in the ILO Convention 190 (June 2019) as "a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment". This potentially covers physical abuse, verbal abuse, bullying and mobbing, sexual harassment, threats and stalking, among other things.

Harassment may be accompanied by inhumane treatment, such as verbal and physical abuse.

EXAMPLES OF ISSUES SUPPLIERS MAY ENCOUNTER:

- Job applicants are denied employment because of personal characteristics or beliefs.
- Medical testing and examinations are administered that do not evaluate an individual's ability to perform the job.
- Certain workers have limited opportunities for bonuses, overtime, promotion or for job skills training based on sex, age, etc.
- Union representatives and members are treated differently than other workers.
- Female employees are threatened with dismissal, loss of seniority or deduction of wages should they become pregnant.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements may enable suppliers to better address the risk of discrimination within the workplace, and help to meet the expectations contained in the Mars Supplier Code of Conduct:

- ☑ A clear and detailed policy prohibiting discrimination and harassment.
- ☑ Procedures and accountability for establishing and maintaining compliance with nondiscrimination laws and regulations.
- ☑ Training for management and workers on the discrimination policy and procedures, including imposing discipline fairly and humanely.
- ☑ Documentation of objective job requirements and progressive disciplinary procedures.
- ☑ Ways to monitor that discrimination prevention controls are working properly and are effective in ensuring an equal opportunity and harassment-free workplace.

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2) https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:
12100:0::NO::P12100_ILO_CODE:C111

☑ Periodic senior level review of how effectively the overall system is performing.

The following sections provide a list of system processes, starting with the clear policies that are the foundation of Planning.

(i) POLICIES

Supplier's company policies may include:

☑ Recruitment, selection and hiring will be solely based on the candidate's ability to perform the job.

☑ Discrimination in compensation and benefits, job advancement, training and other areas of employment is strictly prohibited.

☑ Harassment, intimidation, verbal and physical abuse, and other inhumane treatment is strictly forbidden.

☑ Discipline will be applied fairly to all employees, using a system of progressive discipline.

Workers will be provided with reasonable accommodation for religious practices.

> • Train the interviewers. More than one interviewer is preferred, particularly if they have different backgrounds, as part of a checks and balances system during the interview process
> • Use interview evaluation forms to record notes and evaluation of candidates' suitability based on agreed criteria

✎ PROCEDURES

The following procedures are examples of practices which if implemented would assist a supplier to deploy the policies noted above:

☑ Recruitment, selection and hiring procedures that ensure:

- Job advertisements state only objective job requirements, such as knowledge, skills, years of experience, etc.
- Interviewers use objective interviewing techniques and do not ask questions about personal characteristics.
- No medical examinations or testing unless part of an objective job requirement (e.g. "ability to lift xx pounds unassisted") or where legally required.

☑ Third parties who perform recruitment on behalf of the supplier follow non-discriminatory practices.

☑ A process for wage increases, promotions and bonuses on clearly defined objective job performance criteria.

☑ Disciplinary procedures that:

☑ Prohibit inhumane practices such as verbal and physical abuse,

- Follow a process of progressive discipline.
- Are applied equally and fairly to all employees.

☑ A way for workers to contest a disciplinary action.

☑ A way to take disciplinary action against persons who harass or abuse others in the workplace.

Suggested Practice

Implement procedures that require supervisors and managers to take disciplinary action against an employee in private and in such a way to preserve his/her dignity.

COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, it is recommended that suppliers assign responsibilities for implementation and train responsible staff on their roles. Examples of such practices include:

☑ Providing initial and periodic training for recruitment and hiring staff and those that manage recruitment agents on the supplier's policies and procedures, and legal requirements on anti-discrimination.

☑ Newly hired workers should receive a thorough orientation training related tos the supplier's policies on discrimination and harassment, disciplinary procedures, how to file a complaint about discriminatory practices or incidents of harassment or abuse, and their legal rights and responsibilities.

☑ In-depth training for managers and supervisors on preventing discrimination in the workplace, implementing the supplier's disciplinary procedures, and supervisory skills to prevent harassment and abuse.

☑ Communicating the supplier's policies on discrimination, harassment and inhumane treatment to any third parties that provide recruitment services on the supplier's behalf.

Displaying supplier policy and local laws and regulations on discrimination and harassment in the language(s) that all workers understand.

DOCUMENTATION & RECORDS

It is recommended that key procedures are documented whenever possible to ensure they are followed consistently. The following are examples of such practice:

Suggested Practice

Ensuring that managers understand and consistently enforce the supplier's anti-discrimination rules and policies will allow managers to quickly identify and resolve potential problems early, before they rise to the level of discrimination.

- Explain that discrimination based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, disability, age or genetic information (including family medical history) is prohibited and will not be tolerated. Provide examples or case studies of prohibited conduct, as needed.

☑ Documentation of job candidate interviews and hiring decisions.

☑ Performance evaluations, and documented reasons for transfers, promotions, wage increases, and terminations.

☑ Worker grievance reports related to discrimination and harassment, including how they were investigated and resolved.

☑ Job advertisements showing that only objective job performance requirements are listed.

☑ Records of medical examinations and testing and the corresponding job and/or legal requirement.

☑ Facility rules, disciplinary procedures, and records of disciplinary actions taken.

☑ Records of disciplinary actions taken and any worker appeals.

☑ Records of self-assessments and other evaluations of conformance to the supplier's discrimination and harassment policies and procedures and compliance with applicable legal requirements.

🔍 MONITORING

To evaluate and improve the effectiveness of the supplier's program, suppliers should routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

- ☑ Establish and track simple KPIs to measure program effectiveness on an ongoing basis, such as the percentage of workers surveyed who fell the supplier maintains an inclusive and harassment-free work environment; percentage of disciplinary actions appealed by employees; comparison of workforce demographics to local community demographics, etc.

- ☑ Review disciplinary records to determine if disciplinary actions were applied fairly and in keeping with the supplier's policy and procedures.

- ☑ Conversations with recruitment staff members to ensure they understand and effectively implement the supplier's discrimination prevention requirements.

- ☑ Interviews with newly hired workers to determine if they were asked questions in job interviews that were not related to job skills and qualifications (e.g. plans to have a family).

- ☑ Assess the frequency and nature of worker complaints and grievances related to how they are treated by their supervisors.

- ☑ Perform a regular review of worker performance evaluations to determine if the supplier's process for measuring job performance based on objective standards is being properly followed.

- ☑ Perform periodic interviews or surveys of workers to obtain their feedback on discrimination and harassment in the workplace.

- ☑ Regularly review and revise anti-discrimination and harassment policies and procedures to ensure they are relevant and up to date.

🔍 CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, the supplier should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process includes:

- ☑ Conducting root cause analysis of any issues uncovered during monitoring.

- ☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.

- ☑ Assigning task owners, milestones, and completion dates.

- ☑ Monitoring that changes in procedures have been made and that they produce the desired result.

- ☑ Conducting ongoing periodic senior management review for overall system effectiveness.

Click here for additional resourses

ENVIRONMENT

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems that mitigate a suppliers impact on the Environment.

> ### Suggested Practice
>
> Environmental compliance programs will help to achieve emission reductions, reduced waste handling costs and improved worker health and safety.

DEFINITIONS

Environmental Aspects are the parts of a supplier's activities that can interact with the environment; e.g. use of hazardous chemicals.

An Environmental Impact is a change to the environment – good or bad – caused by an organization's environmental aspects. For example, groundwater contamination caused by a spill of a hazardous chemical.

Environmental performance is the set of measurable results related to the control of the supplier's environmental aspects, such as reducing a supplier's environmental impacts or achieving regulatory compliance.

Pollution is the discharge of a harmful or poisonous substance into the air, water or ground.

An environmental permit is any approval, license or authorization required by an environmental law or regulation.

Waste is an output of a supplier's operations that has no marketable value. If improperly disposed, waste can be a source of pollution.

Recycling is the process of reclaiming and/or reprocessing a material for use in a new product.

Natural Resources are materials or substances such as water, natural gas, and minerals that occur in nature and have an economic value.

Land rights refer to the inalienable ability of individuals and companies to freely obtain, use, and possess land at their discretion, as long as their activities on the land do not impede on the rights of others.

EXAMPLES OF ISSUES SUPPLIERS MAY ENCOUNTER:

- ☑ Failure to obtain environmental permits or not meeting permit requirements (e.g. routine testing of emissions).
- ☑ Regulatory compliance is not assessed on a regular basis.
- ☑ Acquisition of land without following a process of free, prior and informed consent.
- ☑ Unlicensed vendors used to haul and dispose of hazardous waste materials.
- ☑ No process in place to reduce the use of energy, water and other natural resources.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements may enable suppliers to better address the supplier's impact on the environment and help to meet the expectations contained in the Mars Supplier Code of Conduct:

- ☑ A clear and detailed environmental and land acquisition policy.
- ☑ Procedures and accountability for establishing and maintaining compliance with environmental laws and regulations.

☑ Training for management and workers on the environmental policy and procedures, including on the environmental aspects associated with specific jobs.

☑ Documentation of all environmental permits and compliance assessment reports.

☑ Ways to monitor that environmental emission controls are working properly and are effective in maintaining emissions within allowable limits.

☑ Periodic senior level review of how effectively the supplier's overall system is performing.

☑ The following sections provide a list of system processes, starting with the clear policies that are the foundation of Planning.

POLICIES

Supplier's company policies may include:

☑ Compliance with applicable environmental laws and regulations.

☑ Transparent engagement with local communities and indigenous peoples for the purchase or lease of land.

☑ Continuous improvement in environmental performance.

PROCEDURES

Below are examples of practices that if implemented can enable a supplier to deploy the policies noted above:

☑ A way to routinely identify, track and apply applicable environmental and land use laws and regulations.

☑ Process to identify, evaluate and control significant environmental aspects on a regular basis and for all new and modified production processes and equipment.

☑ Emergency preparedness and response procedures for leaks and spills of hazardous materials, and other possible environmental incidents (e.g. failure of emission treatment systems).

☑ Preventive maintenance procedures for emissions control equipment and other pollution controls.

☑ Documented procedures for all jobs with significant environmental aspects (e.g. operation of chemical process equipment, and handling and storage of hazardous waste).

☑ Procedure to identify opportunities to reduce the consumption of energy and water.

☑ Procedure for the reporting and investigation of all environmental incidents and violations of permit conditions, including taking corrective action.

☑ Process to obtain the free, prior and fully informed consent of affected communities or indigenous peoples for all land acquisitions.

COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, suppliers should assign responsibilities for implementation and train responsible staff on their roles. Examples of such practices include:

☑ Communicate the supplier's environmental policy and procedures to all employees in new employee orientation training and periodically thereafter.

☑ Routinely train workers on the environmental aspects and impacts of their jobs, and any associated procedures.

☑ Train all employees and on-site contractors on how to report an environmental incident or emergency and how to safely evacuate the workplace.

☑ Prominently display environmental warnings and instructions, in the language(s) understood by employees where hazards are present.

☑ Offer training for community members on their right to free, prior and informed consent (FPIC) to any land acquisitions or transfers by the supplier that could impact them or their way of life.

☑ Routinely encourage workers to report potential environmental issues or improvement opportunities.

✉ DOCUMENTATION & RECORDS

Key procedures should be documented whenever possible to ensure they are followed consistently. The following are examples of such practices:

☑ Register of all applicable environmental and land use laws, regulations and customer requirements.

☑ Copies of key environmental procedures, such as:

- Hazardous material storage, handling, and use,
- Waste handling, storage, and disposal,
- Operation of processes and equipment with regulatory impact, and
- Maintenance and monitoring of emissions control equipment.

☑ Copies of environmental licenses and permits.

☑ Emissions monitoring records.

☑ Records of maintenance for emissions sources (boilers, generators, and production equipment) to show that legal regulations are checked and consistently achieved.

☑ Records of emergency evacuation drills, chemical spill cleanup drills, and other tests of environmental emergency preparedness.

☑ Land Rights procedures, including, but not limited to: environmental and human rights impact assessment; full, prior, informed consent (FPIC) process, community engagement process, and land rights grievance process.

☑ Minutes of meetings and other outreach sessions with individuals, communities and Indigenous Peoples.

☑ Records of community grievance reports, including their investigation, resolution and, where provided, remediation.

Records of self-assessments and other evaluations of compliance with the supplier's environmental policies and procedures and legal requirements.

Suggested Practice

Regularly tracking its compliance status helps the business identify trends, including problem areas, which may require changes in business processes or practices to further reduce compliance risk and to meet its environmental compliance obligations

MONITORING

To evaluate and improve the supplier's program suppliers should evaluate routinely how well their policies and procedures are being implemented. Monitoring can take the following forms:

- ☑ Establish and track simple KPIs to measure regulatory compliance and program effectiveness on an ongoing basis, such as:
  - ☐ Number of emissions exceedances per month
  - ☐ Number of workers trained on the compliance impact of their job activities
  - ☐ % of identified regulatory non-compliances corrected on time
  - ☐ % of project impacts mitigated to satisfaction of the community
  - ☐ % of community grievances addressed on time
- ☑ Routinely interview or survey workers to measure their understanding of the potential environmental impacts of their jobs and to learn of any unidentified environmental compliance issues.
- ☑ Perform regular facility inspections to verify that environmental aspects are properly controlled, emissions controls are operating properly and are effective, operational procedures are followed where required, and hazardous materials are properly stored.
- ☑ Regularly survey community members to obtain their feedback on the supplier's land use and acquisition policies and practices.

- ☑ Evaluate every environmental incident drill to verify that alarms and notification systems worked properly, and that incident response teams performed as expected.
- ☑ Audit the supplier's environmental and land use processes and procedures on a regular basis. Audits should be performed by trained and qualified internal staff or by external auditors.
- ☑ Regularly evaluate and address any grievances received from community members about environmental or land use issues.

CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, the supplier should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process may include:

- ☑ Conducting root cause analysis of any issues uncovered during monitoring.
- ☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.
- ☑ Assigning task owners, milestones, and completion dates.
- ☑ Monitoring that changes in procedures have been made and that they produce the desired result.
- ☑ Conducting ongoing periodic senior management review for overall system effectiveness.

Click here for additional resourses

ETHICS

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems related to Ethics.

Suggested Practice

Managers should encourage open and honest communication and ensure that employees can raise concerns about business practices without fear of retaliation.

DEFINITIONS

Business ethics is the application of moral principles to business behavior. It defines the principles that suppliers should apply to business decision-making.

Corruption is fraudulent or dishonest behavior or inducing improper behavior by unlawful means, such as bribery.

Bribery is the unlawful practice of offering money or something of value in exchange for obtaining preferential treatment or improper advantage.

Improper Advantage is obtaining something to which the supplier is not entitled, such as a government approval or permit, by means of a bribe or other unethical practice.

A whistleblower is someone who makes an allegation of violation of ethics policy or legal requirements.

EXAMPLE OF ISSUES SUPPLIERS MAY ENCOUNTER:

- Facilitation payments to a government official or agency to expedite performance of an administrative function.
- Offering gifts or something of value to a business partner or government official to influence a decision in favor of the supplier.
- Using confidential information from a supplier, customer or other business partner to gain improper advantage.
- Conflicts of interest, such as receiving compensation from a customer, supplier or competitor.
- No reporting channel for whistleblowers or lack of protection of whistleblowers from retaliation.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements can help suppliers to ethically conduct business:

- ☑ A clear and detailed business ethics policy.
- ☑ Procedures and accountability for establishing and maintaining compliance with bribery and corruption laws and regulations.
- ☑ Training for management and workers on the business ethics policy and procedures, including on the ethics issues associated with specific jobs (for example, gift giving and receiving for procurement staff).
- ☑ Documentation of anti-corruption procedures and records of allegation of ethical misconduct.
- ☑ Ways to monitor that ethics policies and procedures are effective in preventing unethical behavior in the supplier's relationships with business partners and government officials.
- ☑ Periodic management level review of how the overall ethics management system is performing.

The following sections provide a list of system processes, starting with the clear policies that form a foundation of Planning.

ⓘ POLICIES

Supplier's company policies may include:

- ☑ Prohibition of corruption in any form, including giving or accepting bribes.
- ☑ Compliance with applicable anti-corruption laws and regulations, including the US Foreign Corrupt Practices Act and the UK Bribery Act.
- ☑ Prohibition of gift giving or receiving of anything of value is prohibited.
- ☑ Requirement for employees to declare any potential conflicts of interest.

✏ PROCEDURES

The following procedures are examples of practices which if implemented can assist a supplier to implement the policies noted above:

- ☑ A way to routinely identify, track and apply applicable bribery and corruption laws and regulations.
- ☑ Procedure for whistleblowers to report allegations of unethical behavior without fear of intimidation or reprisal.
- ☑ Process to investigate allegations of unethical behavior.
- ☑ A way for employees to declare potential conflicts of interest and to modify their job responsibilities accordingly.
- ☑ Procedure to limit the amount and frequency of gifts given or received.

- ☑ A way to protect employees from retribution for refusing to do anything illegal or in conflict with the supplier's ethics policy (for example, being asked to bribe a government official).

Potential conflict of interest situations

- Significant financial interest in a partner, supplier, or competitor.
- Conducting business with a partner, supplier, or customer when someone with whom the supplier have a close personal relationship (e.g. a family member) has a major position in that supplier.
- Outside employment with business partner, supplier, or competitor.
- Working for a government agency with regulatory authority over the supplier or that buys from the supplier.

👥 COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, suppliers should assign responsibilities for implementation and train responsible staff on their roles. Examples of effective practice include:

- ☑ Communicate the supplier's ethics policy and procedures to all employees in new employee orientation training and periodically thereafter.
- ☑ Routinely train workers on the bribery and corruption aspects of their jobs, and any associated procedures, such as reporting conflicts of interest or limitations on gift giving and receiving.

☑ Train all employees and on-site contractors on how to report allegations of unethical business conduct.

☑ Prominently display the business ethics policy and allegation reporting procedure, in the language(s) understood by employees.

✉ DOCUMENTATION & RECORDS

Key procedures are documented whenever possible to ensure they are followed. Additionally, the supplier should maintain documents and records that demonstrate compliance with ethics requirements. The following are examples of such practices:

☑ Register of all applicable bribery and corruption laws, regulations and customer requirements.

☑ Copy of the supplier's Ethics policy, endorsed by executive management.

☑ Copies of key ethics procedures, such as:

- Declaration of conflicts of interest and adjusting employee responsibilities to avoid such conflicts,
- Reporting allegations of unethical conduct.
- Investigating and addressing allegations of unethical behavior,
- Disciplinary procedure for individuals found to have acted unethically.
- Procedure to routinely evaluate supplier compliance with bribery and corruption laws and regulations.

☑ Copies of internal and third-party audits of supplier financial practices and record keeping.

☑ Records of allegations of unethical conduct and their investigation and resolution.

☑ Copies of non-disclosure agreements and employee declarations of conflict of interest.

☑ Records of disciplinary actions taken for confirmed cases of violation of supplier ethics policy and procedures.

☑ Records of self-assessments and other evaluations of compliance with the supplier's ethics policies and procedures and legal requirements.

🔍 MONITORING

To evaluate and improve the program, suppliers should routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

☑ Establish and track simple KPIs to measure regulatory compliance and program effectiveness on an ongoing basis, such as:

☐ Number of ethics allegations per quarter.

☐ % of ethics allegations for the same practice.

☐ % of identified unethical business practices addressed on time.

☑ Evaluate any threats (explicit or implies) against employees for refusing to take part in any activity that violates the supplier's ethics policy and procedures and take corrective and preventive action as necessary.

☑ Interview or survey workers and business partners to find out if they are aware of and are comfortable with the supplier's procedure for reporting allegations of unethical conduct.

☑ Audit ethics processes and procedures on a regular basis to verify that they are being implemented as intended and are effective.

☑ Regularly evaluate and address all allegations of unethical behavior from employees, suppliers, customers and other business partners.

🔍 CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, suppliers should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process include:

☑ Conducting root cause analysis of any issues uncovered during monitoring.

☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.

☑ Assigning task owners, milestones, and completion dates.

☑ Monitoring that changes in procedures have been made and that they produce the desired result.

☑ Conducting ongoing periodic senior management reviews for overall system effectiveness.

Click here for additional resourses

FORCED LABOR

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems related to Forced Labor.

DEFINITIONS

Forced labor is defined by the International Labour Organization (ILO) as "all work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily."

The terms "offered voluntarily" refer to the free and informed consent of a worker to take a job and his or her freedom to leave at any time. This is not the case for example when an employer or recruiter makes false promises so that a worker take a job he or she would not otherwise have accepted.

Recruitment Agents, also known as private employment agencies or labor brokers, including sub-agents; are third-party service providers involved in the recruitment, selection, hiring, transportation, and, in some cases, management of migrant workers.

Recruitment agents operate in both the sending and receiving countries. Receiving country agents typically work with sending country agents in the country of origin or residence of migrant workers to identify and recruit potential job candidates.

Migrant workers are workers who migrate from their country of origin or permanent residence to obtain employment at the Supplier's facility. This includes domestic and overseas migration.

Penalties include both actual and threats of physical violence, withholding of identify documents, denunciation to authorities, wage withholding and indebtedness.

Human trafficking[3] is bringing workers into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.

Debt-bondage or indebtedness, is when workers should continue to work to repay a debt to a labor broker, their employer, or another third-party, typically because of recruitment fees or loans.

EXAMPLES OF ISSUES SUPPLIERS MAY ENCOUNTER

- Workers pay fees to recruitment agents or sub-agents, often resulting in significant indebtedness.
- Worker identity documents, such as passports, are withheld by labor brokers or employers, limiting their ability to move about freely or quit their jobs.
- Upon arrival in the destination country, workers are asked to sign new contracts that may be for a different job, with lower wages and benefits.
- Workers are automatically enrolled in mandatory savings programs and their money is not available to them until completion of the employment control.
- Foreign migrants and contract workers often work for lower pay and benefits than local regular workers performing the same jobs.

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3) Trafficking in human beings: Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children defines trafficking in persons as follows:

(a) Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements may enable suppliers to ensure workers are ethically recruited and help to meet the expectations contained in the Mars Supplier Code of Conduct:

- ☑ A clear and detailed policy prohibiting forced and bonded labor.

- ☑ Procedures and accountability for establishing and maintaining compliance with laws and regulations related to forced labor and the Mars Code of Conduct.

- ☑ Training for management and workers on the forced labor policy and procedures on ethical recruitment.

- ☑ Documentation of procedures to track whether job seekers or employees are charged recruitment and placement fees and the amount of the fees.

- ☑ Ways to monitor that workers have entered into their employment contract voluntarily and are free to quit without penalty upon giving reasonable notice.

- ☑ Periodic senior level review of how effectively the overall system is performing

The following sections provide a list of system processes, starting with policies that form the foundation of Planning.

ⓘ POLICIES

Supplier's company policies may include:

- ☑ Workers will not be charged recruitment or placement fees by the supplier to obtain a job. All such fees will be paid by the employer.

- ☑ The supplier will only engage recruitment agents with a history of ethical recruitment and a commitment to the supplier's policy requirements.

- ☑ All workers will be provided complete and accurate terms and conditions of employment before being asked to sign an employment contract.

- ☑ There will be no contract substitution and any changes in contract terms will be to the advantage of the worker.

- ☑ Workers will be in possession of their passports and will be provided individual, secure storage facilities.

- ☑ Workers will be free to terminate their employment at any time without penalty upon giving reasonable notice.

- ☑ Workers will not be required to make monetary deposits or to participate in mandatory savings programs.

- ☑ Wages will be paid in full and on time.

- ☑ There will be no unreasonable restrictions in employee movement from the workplace or accommodation when not working.

- ☑ Migrant workers found to be victims of trafficking or provided with fraudulent immigration documents will be provided with access to remedy to the extent allowed by law.

- ☑ On a case by case basis, workers who are found to have paid fees that constrain their ability to freely choose employment as part of the recruitment process will have those fees reimbursed.

✏️ PROCEDURES

The following procedures are examples of practices which if implemented can assist a supplier in deploying the policies noted above:

☑ Recruitment procedures that ensure:

- Job advertisements describe positions accurately and state the policy related to fees.
- Job candidates are given a complete and accurate description of the terms and conditions of employment both verbally and in writing.
- Employment contracts are in a language the worker understands and is provided for review before signing.
- Workers do not make deposits or post bonds in order to obtain the job.
- Procedure to screen all recruitment agents for their recruitment practices, regulatory compliance history, and both willingness and ability to meet the supplier's policy before engaging them.

☑ Formal service agreements with recruitment agencies and labor contractors that workers do not pay any fees that would place them in conditions of Forced Labor.

☑ Workers are in possession of their identity documents at all times and that the agent, broker or employer retains them only as long as needed to obtain or renew required documentation, such as visas and work permits.

☑ Process to ensure that workers are free to return home during paid leave or for family emergencies without penalty.

👥 COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, suppliers should assign responsibilities for implementation and train responsible staff on their roles. Examples of such practices include:

☑ Provide initial and periodic training for recruitment and hiring staff and those that mange recruitment agents and labor contractors on the supplier's policies and procedures, and legal requirements on forced labor prevention.

☑ Newly hired migrant workers should receive a thorough pre-departure training related to their contract terms, information about where they will be living and working, and their legal rights and responsibilities.

☑ All newly hired workers should receive a new hire orientation covering the supplier's workplace policies and procedures – including those addressing forced labor.

☑ Communicate the supplier's forced labor policy to any third parties that provide recruitment services on the supplier's behalf.

☑ Display supplier policy and local laws and regulations on forced labor in the language(s) that all workers understand.

☑ Communicate the supplier's forced labor policy and performance requirements to on-site contractors and service providers.

✉ DOCUMENTATION & RECORDS

Key procedures should be documented whenever possible to ensure they are followed consistently. The following are examples of such practices:

- ☑ Copies of migrant worker personal identification documents, work permits and visas, medical certificates and any other documents and records required by law.

- ☑ Copies of signed employment contracts for all workers.

- ☑ Service agreements with recruitment agencies and labor contractors.

- ☑ A roster of all foreign migrant and local contract workers.

- ☑ Records of recruitment agent and labor contractor screening assessments and records of ongoing monitoring of their performance against the supplier's forced labor requirements.

- ☑ Records of worker grievance reports and how they were investigated and resolved.

- ☑ Records of self-assessments and other evaluations of conformance to the supplier's forced labor policies and procedures and compliance with applicable legal requirements.

🔍 MONITORING

To evaluate and improve the effectiveness of the program, it is recommended that suppliers routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

- ☑ Establish and track simple KPIs to measure program effectiveness on an ongoing basis, such as the number of new migrant workers required to pay excessive recruitment fees or the percentage of new hires who understand their employment agreement.

- ☑ Regular verification of the validity and completeness of migrant worker immigration and work documents to verify that procedures are being properly followed by internal staff and third-party recruitment agents and labor brokers. This process should be part of the routine evaluation of recruitment agent performance.

- ☑ Conversations with recruitment staff members to ensure they understand and effectively implement the supplier's forced labor prevention requirements.

- ☑ Interviews with all new contract workers and newly arrived migrant workers to determine if the supplier's standards were met throughout the recruitment, selection and hiring process.

- ☑ Assess the frequency and nature of contract and migrant worker complaints and grievances related to their treatment during the hiring process, in the workplace, and in supplier-provided or arranged accommodation and transport.

- ☑ Regular evaluations of the performance of recruitment agents and labor contractors in meeting supplier forced labor prevention requirements.

- ☑ Perform periodic interviews or surveys of migrant and contract workers.

CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, supplier should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process may include:

☑ Conducting root cause analysis of any issues uncovered during monitoring.

☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.

☑ Assigning task owners, milestones, and final completion dates.

☑ Monitoring that changes in procedures have been made and that they produced the desired result.

☑ Conducting ongoing periodic senior management reviews for overall systemeffectiveness.

Click here for additional resourses

FREEDOM OF ASSOCIATION

This chapter provides guidance on how to develop and implement management systems related to Freedom of Association.

DEFINITIONS

Freedom of Association[4]

means allowing workers to form and join trade unions, worker associations and worker councils or committees of their own choosing. The purpose is to have good two-way communication between management and workers

Collective Bargaining[5]

is the way employers and worker representatives reach agreements on working conditions, wages, overtime, grievance procedures and worker involvement in workplace affairs.

Peaceful Assembly refers to the right of workers to come together and collectively express their ideas to management related to the terms and conditions of employment. An "assembly" is an intentional and temporary gathering in a private or public space for a specific purpose and includes demonstrations, inside meetings, strikes, processions, rallies or even sits-ins.

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4) ILO Convention 87 - Freedom of Association and Protection of the Right to Organise Convention, 1948. Article 2: "Workers and employers, without distinction whatsoever, shall have the right to establish and, subject only to the rules of the organisation concerned, to join organisations of their own choosing without previous authorization."

5) ILO Convention 154 - Collective Bargaining Convention, 1981. Article 2: "the term collective bargaining extends to all negotiations which take place between an employer, a group of employers or one or more employers' organisations, on the one hand, and one or more workers' organisations, on the other, for--(a) determining working conditions and terms of employment; and/or (b) regulating relations between employers and workers; and/or (c) regulating relations between employers or their organisations and a workers' organisation or workers' organisations.

EXAMPLE OF ISSUES SUPPLIERS MAY ENCOUNTER

- Job applicants are denied employment because of their association with trade unions or other worker organizations.
- Worker representatives are not paid for the time spent on their representative responsibilities.
- Union representatives and members are treated differently than other workers.
- Attempts are made to dissuade workers from joining a trade union or other representative worker organization.
- Worker representatives are selected by management rather than being democratically elected.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements may enable suppliers to ensure that workers' rights to freedom of association and collective bargaining are respected and help to meet the expectations contained in the Mars Supplier Code of Conduct:

- ☑ A clear and detailed commitment to respecting the rights of freedom of association and collective bargaining in the supplier's policy.
- ☑ Procedures and accountability for establishing and maintaining compliance with freedom of association laws and regulations.
- ☑ Training for management and workers on the freedom of association policy and procedures, including how unions and other worker organizations can conduct their activities without interference.

☑ Documentation of all collective bargaining agreements and minutes of worker management meetings.

☑ Ways to monitor that there is no discrimination against job applicants due to union affiliation.

☑ Periodic management level review of how effectively the overall system is performing.

The following sections provide a list of system processes, starting with policies that form the foundation of Planning.

ⓘ POLICIES

Supplier's company policies may include:

☑ Supplier recognition of workers' rights to freedom of association and collective bargaining.

☑ Right for workers to peacefully assemble to discuss workplace issues.

☑ Worker right to join or not join trade unions or other representative worker organizations of their own choosing.

☑ Worker affiliation with trade unions will not be considered in hiring decisions or in eligibility for wage increases, promotion, access to training and other employment decisions.

✎ PROCEDURES

The following procedures are examples of practices which if implemented can assist a supplier to deploy the policies noted above:

☑ Hiring procedures that ensure job applicant affiliation with trade unions or other representative worker organizations is not a consideration in selection for a job.

☑ Clearly defined procedure describing how the supplier interacts with trade unions and other representative worker organizations.

☑ A process to provide reasonable facilities for the union or worker organizations to conduct its business on site.

☑ A way to define a reasonable time and place for peaceful assembly for the purpose of maintaining a safe and productive work environment.

☑ A way for workers to collectively petition management with concerns or requests in the absence of a trade union.

☑ Process to ensure workers are not discriminated against in salary, benefits, or promotion because they belong to a union.

☑ A way to ensure that there is no interference with worker representatives' performance of their duties and that representatives are paid for time spent conducting their representative activities.

Practice Tip

Where Freedom of Association rights are limited by law, make sure that workers know that the supplier is willing to work with an alternative representative worker organization.

COMMUNICATION & TRAINING

To ensure that policies and procedures are followed ,suppliers should assign responsibilities for implementation and train responsible staff on their roles. Some examples of this practice include:

☑ Provide initial and periodic training for all workers, supervisors and managers on the supplier's policies and procedures, and legal requirements on freedom of association and collective bargaining.

☑ In-depth training for managers and supervisors on how to ensure that the rights to freedom of association and collective bargaining are respected and not infringed.

☑ Communicating regularly with all workers on their rights and the supplier policy respecting their rights. The supplier policy should be prominently posted in the workplace in the language(s) understood by the workforce.

☑ Allow worker representatives to participate in training delivered by the trade union on their representative responsibilities.

☑ Make sure that in the absence of a trade union or other representative worker organization, that the supplier communicates to workers their right to peacefully assemble to discuss workplace issues.

✉ DOCUMENTATION & RECORDS

Key procedures are documented whenever possible to ensure they are followed consistently. The following are examples of such practices:

☑ Accurate minutes of union-management meetings or of worker-management meetings (where there is no trade union) covering issues discussed and suggestions or actions agreed upon.

☑ Election results for union or worker organization representatives.

☑ The collective bargaining agreement, if any, with the trade union.

☑ Logs of individual or collective complaints or grievances, including how they were resolved. Actions taken to address issues should be posted in the workplace.

☑ Records showing that supplier support of the union or representative worker organization is limited to provided facilities for it to conduct its business.

☑ Records of self-assessments and other evaluations of conformance to the supplier's freedom of association and collective bargaining policies and procedures and compliance with applicable legal requirements.

🔍 MONITORING

To evaluate and improve the program, suppliers should routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

☑ Establish and track simple KPIs to measure program effectiveness on an ongoing basis, such as the percentage of workers surveyed who understand their rights to freedom of association, collective bargaining and peaceful assembly, and the percentage of workers who believe the supplier respects those rights.

☑ Review termination records and exit interviews to determine if departing workers described discrimination based on union membership or serving as a worker representative.

☑ Conversations with managers and supervisors to ensure they understand and effectively implement the supplier's freedom of association and collective bargaining policy and procedures.

☑ Periodically review recruitment, selection and hiring procedures and records to ensure that there is no discrimination against job applicants with union affiliation.

☑ Routinely review complaints and grievances from workers related to the administration of the supplier's freedom of association and collective bargaining procedures.

CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, supplier should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process includes:

☑ Conducting root cause analysis of any issues uncovered during monitoring.

☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.

☑ Assigning task owners, milestones, and completion dates.

☑ Monitoring that changes in procedures have been made and that they produce the desired result.

☑ Conducting ongoing periodic senior management reviews for overall system effectiveness.

Click here for additional resourses

HEALTH & SAFETY

MANAGEMENT SYSTEMS APPROACH

This chapter provides guidance on how to develop and implement management systems related to Health and Safety.

> Ensuring that workplace safety and health hazards are properly controlled depends on feedback from workers. Employees should be encouraged to report hazards and suggest appropriate control measures.

DEFINITIONS

Job Hazard Analysis is a process to evaluate the health and safety hazards of a job by breaking it down into individual tasks and identifying potential hazards of each task.

Engineering Controls are ways to prevent employee exposure to hazards by controlling them at the source, such as providing machine guarding, local exhaust ventilation, noise enclosure, and chemical storage cabinets.

Personal Protective Equipment (PPE) are devices worn by workers to prevent exposure to hazards that cannot be controlled by engineering means. Typical PPE includes chemical protective gloves, safety glasses, hearing protection and respirators.

Hazardous Material is a chemical substance (solid, liquid, gas or vapor) that has the potential to cause harm to human health by skin contact, inhalation or ingestion.

Physically Demanding Work means work that can cause a musculoskeletal injury due to a combination of the force, frequency of motion and posture involved in performing the job.

EXAMPLES OF CHALLENGES SUPPLIERS MAY ENCOUNTER

The following are typical issues facing suppliers:

- Exit aisles are obstructed and exit doors are locked or blocked.
- Workers are discouraged from reporting health & safety issues and work-related injuries.
- Machine safeguarding is not maintained in good working order or is bypassed.
- Workers should obtain a pass or supervisor's approval to use the toilet or get a drink of water.
- Regular evacuation drills are not conducted.
- Food preparation and storage facilities do not meet local health regulations.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements can help suppliers to ensure that workers have safe and healthy work conditions. Examples of such practices include:

- ☑ A clear and detailed occupational health & safety policy.
- ☑ Procedures and accountability for establishing and maintaining a safe & healthy workplace.
- ☑ Training for management and workers on the health & safety policy and procedures, including on the specific health & safety hazards and precautions of each worker's job.
- ☑ Documentation of all injuries and records of accident investigation reports and their resolution.

☑ Ways to monitor that health & safety hazard controls and procedures are being followed and are effective in preventing work-related injuries and illnesses.

☑ Periodic management level review of how effectively the overall system is performing.

The following sections provide a list of system processes, starting with the policies that form the foundation of Planning.

ⓘ POLICIES

To align with best practice, company policies may include:

☑ Compliance with applicable health & safety laws and regulations.

☑ Maintaining a safe and healthy working environment and employer-provided housing, transportation and food services.

☑ Workers who suffer work-related injuries and illnesses are provided with all medical treatment and related services needed for a full recovery and return to work.

☑ Respect for workers' right to unrestricted access to basic liberties (e.g. toilet facilities and drinking water).

☑ Provide workers with knowledge of the health & safety risks of their jobs.

✎ PROCEDURES

The following procedures are examples of practices which if implemented can assist a supplier to deploy the policies noted above:

☑ A way to systematically identify, track and apply applicable health & safety laws and regulations.

☑ Process to identify, evaluate and control health & safety hazards on a regular basis and for all new and modified production processes and equipment.

☑ Emergency preparedness and response procedures for fire, medical emergencies, and other possible emergency situations (e.g. flood, storm, earthquake, chemical spill).

☑ Preventive maintenance procedures for machine guarding, exhaust ventilation and other hazard controls.

☑ Documented safe work procedures for all jobs with identified health & safety hazards (e.g. "lockout-tagout" procedures to prevent accidental startup and injury while working on machinery or equipment).

☑ Procedure to provide, maintain, and replace as required, personal protective equipment where hazards cannot be controlled by engineering means.

☑ Procedure for the reporting and investigation of all work-related injuries and illnesses, including taking appropriate actions to prevent a recurrence.

☑ Process to encourage workers to report safety and health concerns or offer suggestions for hazard controls without fear of intimidation or reprisal.

**Risk vs Hazard:
What's the difference?**

A **hazard** is a potential danger. **Risk** is the chance of something going wrong and the severity of the outcome.

Exposed electrical wires are an electrocution hazard, that is, they have the potential to cause injury.

A risk is the probability of a worker contacting the wires and getting shocked, burned or killed.

COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, suppliers should assign responsibilities for implementation and train responsible staff on their roles. Some examples of such practices include:

- ☑ Communicate the health & safety policy and procedures to all employees in new employee orientation training and periodically thereafter.
- ☑ Routinely train all workers on the specific hazards and health & safety procedures for their jobs.
- ☑ Train all employees and on-site contractors on how to report a fire or other emergency and how to safely evacuate the workplace.
- ☑ Prominently display health & safety warnings and instructions, in the language(s) understood by employees where hazards are present.
- ☑ Train workers on how to report workplace injuries and illnesses and the importance of doing so.
- ☑ Routinely encourage workers to report potential health & safety hazards in the workplace or in their housing.
- ☑ Inform workers of their rights to access basic liberties as needed, and to take the rest and meal breaks to which they are entitled.

Continuous learning.

Training doesn't end after one session or presentation. Workers need to be continuously reminded of safe practices. Encourage workers to monitor others for safe practices. Encourage workers to report hazards and suggest corrective measures. And recognize workers for exemplary safety practices.

DOCUMENTATION & RECORDS

Key procedures are documented whenever possible to ensure they are followed. The following are examples of such practice:

- ☑ Register of all applicable health & safety laws, regulations and customer requirements.
- ☑ Records of health & safety hazard assessments.
- ☑ Health & safety procedures, such as emergency evacuation, electrical safety, use of personal protective equipment, industrial hygiene, among others.
- ☑ Health & safety committee meeting minutes, action items, and attendance records.
- ☑ Log of work-related accidents, injuries and illnesses.
- ☑ Records of emergency evacuation drills, chemical spill cleanup drills, and other tests of emergency preparedness.
- ☑ Internal and third-party audit reports, workplace inspections, accident investigation reports, and compliance inspection reports by regulatory agencies.
- ☑ Health & safety corrective and preventive action plans, including documented evidence of hazard control improvements.
- ☑ Records of health & safety training attendance and assessment of knowledge and/or skills (quizzes, tests, skills demonstrations).
- ☑ Inspection and maintenance records for machinery, machine safeguards, local exhaust ventilation, and other health and safety hazard control systems.

☑ Records of self-assessments and other evaluations of conformance to the supplier's health & safety policies and procedures and compliance with applicable legal requirements.

🔍 MONITORING

To evaluate and improve the program, suppliers should routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

☑ Establish and track simple KPIs to measure program effectiveness on an ongoing basis, such as:

☐ Injury and illness rates (incidence rate and lost workday rate).

☐ Percentage of reported accidents investigated.

☐ Percentage of corrective and preventive actions implemented on time.

☐ Percentage of workers trained on job-specific health & safety hazards.

☑ Routinely interview or survey workers to measure their satisfaction with workplace health & safety conditions and to learn of any unidentified health & safety hazards.

☑ Perform regular workplace, housing and food service inspections to verify that health & safety hazards are properly controlled, machine guarding is effective, PPE is used where required, hazardous materials are properly stored, and exhaust ventilation systems are working properly.

☑ Perform routine monitoring of worker exposure to potential health hazards (noise, dust, vapors, gases, ionizing and non-ionizing radiation, etc.)

☑ Evaluate every emergency evacuation drill to verify that alarms and notification systems worked properly, and all employees were able to leave the facility in the designated time.

☑ Audit the supplier's health & safety processes and procedures on a regular basis. Audits should be performed by trained and qualified internal staff or by external auditors.

🔍 CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, supplier should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process includes:

☑ Conducting root cause analysis of any issues uncovered during monitoring.

☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.

☑ Assigning task owners, milestones, and completion dates.

☑ Monitoring that changes in procedures have been made and that they produce the desired result.

☑ Conducting ongoing periodic senior management reviews for overall system effectiveness.

Click here for additional resourses

ISSUE REPORTING

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems related to Issue Reporting.

DEFINITIONS

Grievance is an allegation or report of a right violated, a procedure or standard not followed, an obligation not fulfilled, or other workplace practice or condition that could adversely impact a worker.

Grievance Process is the mechanism used by the supplier by which employees can report a an issue or grievance to management and the way the grievance is investigated and resolved.

Confidential means the protection of the worker's identity throughout the issue reporting and resolution process, while anonymous refers to the ability of a worker to report a grievance without identifying her/himself. Anonymity is especially important for vulnerable workers.

EXAMPLES OF ISSUES SUPPLIERS MAY ENCOUNTER:

- Employees do not use the grievance process because they do not trust it to protect their confidentiality or they believe it is ineffective.
- Reported issues are not addressed in a timely manner.
- Workers are not aware of how to report a grievance anonymously.
- Workers suffer retaliation or harassment for reporting grievances.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements may help suppliers to ensure that the supplier's workers have access to proper channels of communication and issue reporting processes:

- ☑ A clear and detailed issue reporting (worker grievance) policy.
- ☑ Procedures and accountability for implementing a confidential worker grievance process that is trusted by workers and includes prompt investigation and resolution of reported issues.
- ☑ General training for management and workers on the grievance policy and process, including how to report a grievance and the process for grievance resolution and communication to the affected worker(s).
- ☑ Documentation of the grievance process and records of grievances reports and their resolution.
- ☑ Ways to monitor that the issue reporting and investigation process is being followed, that workers feel comfortable using the process, and that it is effective in identifying and resolving issues related to the implementation of workplace policies and procedures affecting workers.
- ☑ Periodic senior level review of how effectively the overall system is performing.

The following sections provide a list of system processes, starting with the policies that form the foundation of Planning.

Mars Supplier Code of Conduct Guidebook

(i) POLICIES

Supplier's company policies may include:

- ☑ Constructive resolution of issues related to the implementation of supplier policies and procedures.
- ☑ Confidentiality of the individual reporting the issue will be protected.
- ☑ Ability to raise issues and grievances anonymously.
- ☑ Multiple reporting channels will be provided – formal and informal.
- ☑ Prohibition of retaliation or harassment of individuals who report a grievance.

The more reporting channels available to employees, the more comfortable workers may be to report an issue.

The typical range of reporting channels includes:

- Verbal reporting to a supervisor or Human Resources
- Telephone hotline
- Online, web-based report forms
- SMS messaging, and
- Suggestion boxes in locations that ensure privacy

✏ PROCEDURES

The following procedures are examples of practices which if implemented may assist a supplier to deploy the policies noted above:

- ☑ A way for workers to report using different reporting channels, including at least one that provides anonymity.
- ☑ Procedure that allows workers to report a grievance against a supervisor to a person other than the supervisor (or someone in the same management reporting chain).
- ☑ Procedure for timely management investigation and resolution of grievance reports with communication back to the individual who filed the grievance.
- ☑ A procedure for workers to track the status of grievances.
- ☑ Process for workers to appeal the resolution of a grievance with which they do not agree.

COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, suppliers should assign responsibilities for implementation and train responsible staff on their roles. Examples of such practices include:

- ☑ Communicate the grievance process to all employees in new employee orientation training and periodically thereafter.
- ☑ Prominently display instructions, in the language(s) understood by employees, on the different ways to report a grievance.
- ☑ Include instruction on issue reporting in an employee handbook or on the back of employee identification badges.
- ☑ Provide training for all managers and others with assigned responsibility for receiving and responding to employee grievances.

☑ Communicate the time limits for management to respond, in writing, to worker grievances. When resolution is delayed, the supervisor or manager handling the complaint should communicate, also in writing, the reason for the delay.

☑ Train workers on how to appeal a grievance decision if they disagree with how it was resolved.

✉ DOCUMENTATION & RECORDS

Key procedures are documented whenever possible to ensure they are followed consistently. The following are examples of such practice:

☑ Documentation of the grievance reporting, investigation, resolution and appeal processes.

☑ Logging and classification of all reported issues. Classification of issues is needed to separate grievances from safety concerns, improvement suggestions, and other reported issues.

☑ Grievance records that include the issue, when it was reported, who it was assigned to for investigation and resolution, how it was addressed, when it was communicated back to the grievant. All such records should be kept confidential, with access limited to designated individuals.

☑ A summary of issues reported through the grievance process, as well as management's response(s) to the issues raised, should be posted in areas accessible to the workers, such as on notice boards and in the canteen. Postings should not contain any information that could be used to identify the grievant.

☑ Records of grievance appeals, including meeting minutes and a statement of the final resolution of the issue.

☑ Records of self-assessments and other evaluations of conformance to the supplier's grievance policies and procedures and compliance with applicable legal requirements.

🔍 MONITORING

To evaluate and improve the program, suppliers should routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

☑ Establish and track simple KPIs to measure program effectiveness on an ongoing basis, such as the:

  ☐ percentage of grievances addressed within the stated time limit;

  ☐ percentage of grievances filed for the same issue; and

  ☐ percentage of issue resolutions appealed by workers.

☑ Routinely interview or survey workers to understand their level of trust and confidence in the grievance process.

☑ Regularly evaluate utilization of the available reporting channels to determine if they are meeting the should have of the workforce.

☑ Periodically evaluate how well the defined process for investigating and resolving grievances is being followed by managers and other responsible individuals by reviewing grievance records and interviewing responsible staff to understand their knowledge of the process.

CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, supplier should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process includes:

- ☑ Conducting root cause analysis of any issues uncovered during monitoring.

- ☑ Setting improvement targets and developing both corrective and preventive actions modified procedures) to address each identified root cause.

- ☑ Assigning task owners, milestones, and final completion dates.

- ☑ Monitoring that changes in procedures have been made and that they produced the desired result.

- ☑ Conducting ongoing periodic senior management reviews for overall system effectiveness.

Click here for additional resourses

WORK HOURS

MANAGEMENT SYSTEMS APPROACH:

This chapter provides guidance on how to develop and implement management systems related to Work Hours.

DEFINITIONS

Regular work hours are the hours worked during the normal work day. Local law typically sets the limit of regular hours to between 40 and 48 per week.

Overtime are the hours worked beyond the number of regular hours in a day or week. Overtime can be performed either before or after the worker's normal work day or shift.

Rest time refers to the short rest and meal breaks from work during the normal workday or the full day off each week. Both rest breaks and rest days are typically required by local law.

Working hours records describes the system of timekeeping to accurately record actual hours worked. These records typically include:

- Shift schedule and production records.
- Time cards and/or electronic timekeeping data.
- Overtime approval records.

EXAMPLE OF ISSUES SUPPLIERS MAY ENCOUNTER:

- Employees work more hours than allowed by law each week or month.
- Overtime work cannot be refused without retaliation or penalty, such as not being offered overtime work in the future.
- Employees work for weeks without a rest day, resulting in an increase of work-related injuries and lower productivity.

- Workers are not provided with the daily rest breaks required by law.

USE A MANAGEMENT SYSTEMS APPROACH TO ADDRESS COMMON RISKS

Implementing the following management system elements may help suppliers to ensure that work hours are properly managed:

- ☑ A clear and detailed commitment to limiting work hours in compliance with the law and in consideration of worker safety in the supplier's policy.
- ☑ Procedures and accountability for establishing and maintaining compliance working hours laws and regulations.
- ☑ Training for management and workers on work hours legal requirements and how to manage work hours to within legal limits.
- ☑ Documentation of all hours worked in the timekeeping system and worker pay slips.
- ☑ Ways to monitor that work hours do not exceed legal limits and that workers are provided with one day of rest each week.
- ☑ Periodic senior level review of how effectively the overall system is performing.

ⓘ POLICIES

Supplier's company policies may include:

- ☑ Compliance with country and local laws and regulations governing working hours and time off.
- ☑ Rest breaks and meal breaks will be provided during the work day as required by law.

☑ Workers can refuse overtime without penalty.

☑ Overtime work will not be assigned if the additional time could compromise worker health and safety.

☑ Juvenile workers will not be assigned overtime or night work.

☑ 24 consecutive hours of rest will be provided every seven days, or 48 consecutive hours every 14 days when required for production and allowed by local law.

☑ Workers will not be required to work more than 60 hours per week (including overtime).

✏️ PROCEDURES

The following procedures are examples of practices which if implemented can assist a supplier to deploy the policies noted above:

☑ A way for workers to accurately record their own work hours, preferably using an electronic timekeeping system.

☑ Process for planning production and managing working hours that ensures hours worked do not exceed legal limits.

☑ Procedure to ensure juvenile workers (those under age 18) do not work overtime or at night.

☑ Procedure to request employees to work overtime, including the ability for employees to turn down such requests.

☑ A work scheduling process that ensures all workers are given a least one day of rest (24 consecutive hours) per seven days worked.

☑ A leave scheduling process that ensures all employees are able to take the paid annual leave and public holidays to which they are entitled.

☑ Process to provide employees with pay slips that list regular and overtime hours worked and leave time.

👥 COMMUNICATION & TRAINING

To ensure that policies and procedures are followed, suppliers should assign responsibilities for implementation and train responsible staff on their roles. Examples of such practice include:

☑ Providing initial and periodic training for all workers, supervisors and managers on the supplier's policies and procedures, and legal requirements on working hours, breaks and time off.

☑ In-depth training for managers and supervisors on how to manage working hours to within legal limits.

☑ The supplier work hours policy should be prominently posted in the workplace in the language(s) understood by the workforce.

☑ Training production workers to perform more than one job to accommodate seasonal production should have or to replace employees who are absent or on leave without requiring employees to work excessive hours.

☑ Communicating regularly to employees during busy production periods about anticipated overtime hours.

✉ DOCUMENTATION & RECORDS

Key procedures are documented whenever possible to ensure they are followed. The following are examples of such practice:

- ☑ Accurate records of hours worked for each employee, such as individual pay slips and reports generated from the timekeeping and payroll systems.

- ☑ Documented process for managing employee work hours to within legal limits. The process should be cross-functional, with input from Production Planning, Human Resources, Procurement, and Sales and Marketing.

- ☑ Records of employee grievances related to inaccurate recording of working hours, or inaccurate wage payments for the number of recorded regular and overtime hours.

- ☑ Employment contracts that list regular work hours, work breaks and rest days, anticipated overtime hours, legal limits on work hours, and the wage rates that will be paid for both regular and overtime work.

- ☑ Any documented worker-management agreement(s) that require employees to work a specified amount of overtime, such as in a Collective Bargaining Agreement (CBA).

- ☑ Copies of signed worker consent forms for overtime work.

- ☑ Records of self-assessments and other evaluations of conformance to the supplier's work hours policies and procedures and compliance with applicable legal requirements.

🔍 MONITORING

To evaluate and improve the program, suppliers should routinely evaluate how well their policies and procedures are being implemented. Monitoring can take the following forms:

- ☑ Establish and track simple KPIs to measure program effectiveness on an ongoing basis, such as the total hours worked per week or month; the percentage of workers receiving one 24-hour rest day per week; absenteeism or tardiness relative to hours worked; and productivity or quality metrics relative to hours worked.

- ☑ Perform random checks of the regular and overtime work hours listed on worker pay slips against timekeeping system records to make sure that work hours are being recorded properly.

- ☑ Regularly evaluate trends in hiring, production capacity planning, working hours and other functions and data to help the supplier meet legal requirements for regular and overtime hours.

- ☑ When a situation arises that results in employees working excessive overtime or without a day off, investigate and address the root causes of the problem to put in place sustainable solutions to prevent a recurrence. For example, was it because of unexpected circumstances such as a rush order or broken equipment, or due to a more systemic problem, such as raw material quality issues or high worker turnover?

- ☑ Routinely review complaints and grievances from workers related to the administration of the supplier's work hours policies and procedures.

CORRECTIVE ACTION & SYSTEM REVIEW

For continuous improvement of procedures, supplier should undertake immediate corrective and preventive actions, as well as periodic system reviews. This process includes:

- ☑ Conducting root cause analysis of any issues uncovered during monitoring.

- ☑ Setting improvement targets and developing both corrective and preventive actions (modified procedures) to address each identified root cause.

- ☑ Assigning task owners, milestones, and completion dates.

- ☑ Monitoring that changes in procedures have been made and that they produce the desired result.

- ☑ Conducting ongoing periodic senior management reviews for overall system effectiveness.

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ADDITIONAL RESOURCES SECTION

MANAGEMENT SYSTEMS

- **International Labour Organization**

  ✓ Guidelines on occupational safety and health management systems – ILO-OSH 2001;
  http://www.ilo.org/safework/info/standards-and-instruments/WCMS_107727/lang--en/index.htm

  ✓ Audit Matrix for the ILO Guidelines on Occupational Safety and Health Management Systems
  (ILO-OSH-2001):
  http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---safework/documents/publication/wcms_214128.pdf

- **United Nations Global Compact**

  ✓ Guiding Principles on Business and Human Rights (pages 13 – 27):
  http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

- **Social Accountability International:**

  ✓ Guidance document for social accountability:
  http://www.sa-intl.org/index.cfm?fuseaction=document.viewDocument&documentid=563&documentFormatId=1166&vDocLinkOrigin=1&CFID=16526546&CFTOKEN=a3488158d311bf6b-B50FDD1C-1C23-C8EB-803CF412CB1C445B

- **International Organization for Standardization (ISO)**

  ✓ ISO 14001:2015 – Environmental management systems:
  https://www.iso.org/publication/PUB100411.html

  ✓ ISO 26000:2010 – Guidance on social responsibility:
  https://www.iso.org/standard/42546.html

  ✓ ISO 20400:2017 – Sustainable Procurement - Guidance:
  https://www.iso.org/standard/63026.html

  ✓ ISO 45001:2018 Occupational health and safety:
  https://www.iso.org/standard/63787.html

  ✓ ISO 37001:2016 – Anti-bribery Management Systems – Requirements with guidance for use:
  https://www.iso.org/standard/65034.html

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ADDITIONAL RESOURCES SECTION

CHILD LABOR

- **International Labour Organization**

  ✓ How to do business with respect for children's right to be free from child labour: ILO-IOE child labour guidance tool for business:
  http://www.ilo.org/ipecinfo/product/download.do?type=document&id=27555

  ✓ Training Manual to Fight Trafficking in Children:
  https://www.ilo.org/ipec/areas/Traffickingofchildren/WCMS_111537/lang--en/index.htm

- **Ethical Trading Initiative (ETI):**
  http://www.ethicaltrade.org/

  ✓ ETI - Child Labour:
  http://www.ethicaltrade.org/in-action/issues/child-labor

  ✓ Base Code Guidance – Child Labour:
  https://www.ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_-_child_labour_web_0.pdf

- **Fair Labor Association (FLA):**
  http://www.fairlabor.org/topic/child-labor

- **UN Global Compact (Principle 5):**
  https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-5

ADDITIONAL RESOURCES SECTION

COMPENSATION AND BENEFITS

- **International Labour Organization:**
  http://www.ilo.org

  ✓ LO Labour Standards on Wages:
  http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/wages/lang--en/index.htm

- **Ethical Trading Initiative (ETI):**
  http://www.eti.org

  ✓ ETI Base Code:
  http://www.ethicaltrade.org/resources/key-eti-resources/eti-base-code

  ✓ Living wage: make it a reality:
  http://www.ethicaltrade.org/resources/key-eti-resources/living-wage-eti-conference-08-briefing-paper

- **UN Global Compact**

  ✓ "The Labour Principles - A Guide for Business:"
  http://www.unglobalcompact.org/docs/issues_doc/labour/the_labour_principles_a_guide_for_business.pdf

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ADDITIONAL RESOURCES SECTION

DISCRIMINATION

- **International Labour Organization:**

  - ✓ ILO Helpdesk – Q&As on Business, Discrimination & Equality:
    https://www.ilo.org/empent/areas/business-helpdesk/faqs/WCMS_DOC_ENT_HLP_BDE_FAQ_EN/lang--en/index.htm

- **Ethical Trading Initiative (ETI):**
  http://www.ethicaltrade.org/

  - ✓ Women Workers:
    http://www.ethicaltrade.org/in-action/issues/women-workers

  - ✓ HIV/AIDS at Work:
    http://www.ethicaltrade.org/in-action/issues/HIVAIDS-at-work

- **UN Global Compact**

  - ✓ "The Labour Principles - A Guide for Business:"
    http://www.unglobalcompact.org/ docs/issues_doc/labour/the_labour_principles_a_guide_for_business.pdf

  - ✓ UN Global Compact Principle Six:
    https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-6

ADDITIONAL RESOURCES SECTION

ENVIRONMENT

- **United Nations**

  ✓ UN Global Compact – Preserving the Livelihoods of Indigenous Peoples:
    https://www.unglobalcompact.org/what-is-gc/our-work/social/indigenous-people

  ✓ UN Global Compact - A Business Reference Guide: United Nations Declaration on the Rights of Indigenous Peoples:
    https://www.unglobalcompact.org/docs/issues_doc/human_rights/IndigenousPeoples/BusinessGuide.pdf

- **International Finance Corporation (IFC):**

  ✓ Performance Standards on Environmental and Social Sustainability (2012):
    http://www.ifc.org/wps/wcm/connect/115482804a0255db96fbffd1a5d13d27/PS_English_2012_Full-Document.pdf?MOD=AJPERES

- **United States Environmental Protection Agency (EPA)**

  ✓ Compliance with Environmental Laws:
    https://www.epa.gov/compliance

- **European Commission**

  ✓ Environment:
    http://ec.europa.eu/environment/index_en.htm

  ✓ Eco-Management and Audit Scheme (EMAS):
    http://ec.europa.eu/environment/emas/index_en.htm

ADDITIONAL RESOURCES SECTION

ETHICS

- **UK Bribery Act:**
  https://www.legislation.gov.uk/ukpga/2010/23/contents

- **US Foreign Corrupt Practices Act:**
  http://www.justice.gov/criminal/fraud/fcpa/

- **OECD, Good Practice Guidance on Internal Controls, Ethics, and Compliance:**
  http://www.oecd.org/investment/briberyininternationalbusiness/anti-briberyconvention/44884389.pdf

- **Transparency International**

  - ✓ Business Principles for Countering Bribery:
    http://www.transparency.org/whatwedo/tools/business_principles_for_countering_bribery/1/

  - ✓ Business Principles for Countering Bribery – Small and medium enterprise (SME) edition:
    http://www.transparency.org/whatwedo/tools/business_principles_for_countering_bribery_sme_edition/1/

  - ✓ Business Integrity Toolkit:
    https://www.transparency.org/whatwedo/tools/business_integrity_toolkit/0

- **UN Global Compact** – Anti-corruption:
  https://www.unglobalcompact.org/what-is-gc/our-work/governance/anti-corruption

- **International Finance Corporation (IFC):**

  - ✓ Combatting Fraud and Corruption:
    https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/AC_Home

ADDITIONAL RESOURCES SECTION

FORCED LABOR

- **International Labour Organization**

  - ✓ ILO Topics – Forced Labour:
    http://www.ilo.org/global/topics/forced-labour/lang--en/index.htm

  - ✓ ILO Helpdesk – Business and Forced Labour:
    http://www.ilo.org/empent/areas/business-helpdesk/WCMS_DOC_ENT_HLP_FL_EN/lang--en/index.htm

- **California Transparency in Supply Chains Act:**
  http://info.sen.ca.gov/pub/09-10/bill/ sen/sb_0651-0700/sb_657_bill_20100930_chaptered.html

- **Verité Research:**
  http://www.verite.org/helpwanted/toolkit/

- **UN Global Compact:**

  - ✓ UN Global Compact Principle Four: Forced and Compulsory Labour:
    http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/Principle4.html

- **UK Modern Slavery Act 2015:**
  http://www.legislation.gov.uk/ukpga/2015/30/ contents/enacted

- **Business and Human Rights Resource Center: French Corporate duty of vigilance law:**
  http://www.respect.international/french-corporate-duty-of-vigilance-law-english-translation/

ADDITIONAL RESOURCES SECTION

FREEDOM OF ASSOCIATION

- **International Labour Organization:**
  http://www.ilo.org

  - ✓ ILO Helpdesk - Freedom of Association:
    http://www.ilo.org/empent/areas/ business-helpdesk/WCMS_DOC_ENT_HLP_FOA_EN/lang--en/index.htm

  - ✓ ILO Helpdesk - Collective Bargaining:
    http://www.ilo.org/empent/areas/business-helpdesk/WCMS_DOC_ENT_HLP_CB_EN/lang--en/index.htm

- **Ethical Trading Initiative:**

  - ✓ Freedom of Association and Collective Bargaining guidance:
    http://www.ethicaltrade.org/resources/key-eti-resources/foa-and-cb-guidance

  - ✓ Union rights at work:
    http://www.ethicaltrade.org/issues/union-rights-work

- **UN Global Compact:**

  - ✓ Principle 3: Freedom of Association and Collective Bargaining:
    https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-3

  - ✓ Human Rights Dilemmas forum:
    http://human-rights.unglobalcompact.org/dilemmas/freedom-of-association/

ADDITIONAL RESOURCES SECTION

HEALTH AND SAFETY

- **International Labor Organization**

  ✓ ILO Occupational Safety and Health:
    http://www.ilo.org/safework/lang--en/index.htm

- **United States Occupational Safety and Health Administration (OSHA):**

  ✓ Safety and Health Topics:
    https://www.osha.gov/SLTC/index.html

- **European Union Agency for Health and Safety at Work**

  ✓ http://osha.europa.eu/en

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ADDITIONAL RESOURCES SECTION

ISSUE REPORTING

- **Harvard University: Rights-Compatible Grievance Mechanisms – A Guidance Tool for Suppliers:**
  https://sites.hks.harvard.edu/m-rcbg/CSRI/publications/Workingpaper_41_Rights-Compatible%20Grievance%20Mechanisms_May2008FNL.pdf

- **International Labour Organization:**
  http://www.ilo.org

  ✓ Factsheet No. 5 – Grievance Handling:
  http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---travail/documents/publication/wcms_622209.pdf

- **Ethical Trading Initiative:**

  ✓ Access to remedy – Operational Grievance Mechanisms:
  https://ethicaltrade.org/sites/default/files/shared_resources/ergon_-_issues_paper_on_access_to_remedy_and_operational_grievance_mechanims_-_revised_draft.pdf

ADDITIONAL RESOURCES SECTION

WORK HOURS

- **International Labour Organization**:
  http://www.ilo.org

  ✓ Working time –
    http://www.ilo.org/empent/areas/business-helpdesk/WCMS_DOC_ENT_HLP_TIM_EN/lang--en/index.htm

- **Verité:**
  http://www.verite.org

- **For Workers' Benefit – Solving Overtime Problems in Chinese Factories:**
  http://www.verite.org/sites/default/files/Chinese_Overtime_White_Paper.pdf

- **Impactt:**
  http://www.impacttlimited.com

  ✓ https://impacttlimited.com/wp-content/uploads/2017/01/ImpacttOvertimeReport-1.pdf

- **Ethical Trade Initiative (ETI):**

  ✓ Base Code Guidance: Working hours:
    https://www.ethicaltrade.org/resources/base-code-guidance-working-hours

  ✓ China Working Hours Briefing:
    https://www.ethicaltrade.org/sites/default/files/shared_resources/china_working_hours_briefing.pdf

- **UN Global Compact:**

  ✓ Human Rights Dilemmas forum:
    https://hrbdf.org/dilemmas/working-hours/