



Responsible Business Alliance

Advancing Sustainability Globally

PRACTICAL GUIDE TO RESPONSIBLE SOURCING OF GOODS AND SERVICES

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EXECUTIVE SUMMARY

In recent years there has been a considerable shift from a purely cost-based approach in procurement toward an approach that factors in the social and environmental impacts of the goods and services purchased. From a buyer's perspective, social and environmental performance are evaluated in many ways and across a broad range of topics. The proliferation of evaluation methods against a global backdrop of many competing methodologies that attempt to provide scoring or benchmarking create challenges and make it difficult for companies to provide assurances of compliance with social and environmental requirements in an efficient, standardized manner.

The goals of the Responsible Business Alliance (RBA) Practical Guide to Responsible Sourcing are to demonstrate how:

1. RBA tools and programs provide an efficient and effective assurance model for the management and mitigation of adverse social and environmental impacts.
2. RBA tools and programs have been successfully used by members for some time.
3. Specific tools can be successfully incorporated by buyers, including to those seeking to implement socially responsible procurement goals as provided for by the European Union (EU) Public Procurement Directives.

P Special highlights are called out for public buyers using this symbol

RBA tools and programs are aligned to leading international standards including the ILO International Labor Standards, OECD's Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, and the Universal Declaration of Human Rights.

This guide provides a summary of how RBA's systems function, and at what step to apply them in the procurement cycle. This is an important progression toward strengthening industry alignment, promoting higher standards, driving efficiency, and creating meaningful engagement with the value chain.

P Public Procurement

Public buyers are increasingly expected to pursue responsible purchasing, alongside their traditional functions of securing the best possible value for money, fostering open competition, dealing fairly and ethically, and ensuring diverse suppliers have a chance at winning contracts. Procurement professionals need credible, qualified partners to inform responsible decision making. As a result of reading this guide, we believe buyers will:

- Positively consider RBA members in their procurement cycle, knowing that members operate within a strong accountability framework that informs their due diligence management.
- See how RBA member companies apply the RBA tools discussed in this guide.
- Use this guide as a reference throughout the procurement contracting process.

ABOUT THE RBA

The RBA is the world's largest industry coalition dedicated to corporate social responsibility in global supply chains.

- Electronics, retail, automobile and toys
- 2004 - founded by leading electronics firms
- 2021 - 400+ members in the RBA and its Initiatives
- Members directly employ more than 22 million people
- Members' combined annual revenue is greater than US \$7 trillion
- RBA and its members have facilitated the repayment of over US \$50M in recruitment fees to workers
- Over 8.5M workers covered by VAP audits to date

PROCUREMENT: A CRUCIAL PILLAR IN PROMOTING RESPONSIBLE BUSINESS CONDUCT

Increasingly, public and private procurement play important roles in preventing social and environmental harms and promoting the rights of vulnerable groups in supply chains by providing incentives to drive responsible business practices.

To amplify this, the scale of public procurement creates a compelling case for making meaningful changes in companies that want to obtain, or service, public contracts. It is also effective at elevating performance across industries.

P Public Procurement

Public Procurement accounts for 13 percent of GDP and nearly a third of government expenditures in OECD countries, with 55 percent of procurement being undertaken at the sub-national level.¹ There is an opportunity to better align public and private methods of conducting assurance to improve performance, and reduce duplication of research, audits, data records, consulting and more. Now more than ever, transparency, accountability mechanisms and harmonized frameworks are needed. RBA tools and processes make this easier for public and private buyers by providing a proven strategy with documented, repeatable processes.

This guide examines procurement in the ICT sector. Making responsible purchasing decisions can be challenging due to:

- Dynamic, long and complex value chains across multiple countries
- An increasing number of reporting frameworks, each with different benchmarks and standards
- Hundreds of indicators for human rights, labor rights, environmental impacts and business ethics
- Limited resources of smaller purchasing entities
- Evolving legal and regulatory landscapes, particularly on due diligence expectations, modern slavery disclosure and import bans related to goods suspected to be made with forced labor
- Operating in markets with deep-rooted and underlying developmental challenges where social and environmental maturity is lacking

RBA members understand these challenges for buyers.

They desire to meet customer contract requirements, demonstrate responsible business processes, and alignment between international framework (UNGPs, ILO), RBA Code, and due diligence processes. Members have experience with risk assessments, transparency, continuous improvement and corrective action, all of which bring confidence to their customers that social and environmental responsibility is embedded into their business model.

ORIGIN OF THIS PUBLICATION

This Practical Guide seeks to simplify the process between buyers and suppliers. The focus and scope of it was informed by:

- Conversations with buyers and procurement groups across Europe
- Focus groups with RBA members
- OECD Due Diligence Guidance for Responsible Business Conduct
- Input from multiple NGOs
- Additional publications and engagement across a range of stakeholder groups

¹ <https://www.oecd.org/corruption-integrity/checklists/promoting-efficient-transparent-sub-national-procurement-aci.html>

RBA SYSTEMS SUPPORT PUBLIC AND PRIVATE PROCUREMENT

The RBA encourages a consistent and harmonized approach to responsible procurement across supply chains in the implementation of transparency, risk assessment, monitoring, continuous improvement activities and remediation for workers who have paid fees during the recruitment process. RBA tools, programs and initiatives help members to benchmark suppliers and validate the fulfillment of social and environmental requirements.

The RBA approach to supply chain management can be informative for buyers who are similarly seeking trusted assessment, mitigation and continuous improvement of adverse social and environmental impacts. The RBA approach is based on more than 15 years of best practices and a proven approach to responsible sourcing. RBA standards are included in the requirements by of global product labels such as TCO (Europe) and EPEAT (U.S.) as well as noted in government guidelines by Bitkom (in Germany) and DEFRA (in the UK) as acceptable assurance. To aid buyers in procurement exercises, and to help RBA members demonstrate responsible business conduct is embedded in their supply chains, highlighted below are the RBA tools and processes available at each step of the process to benefit buyers and suppliers.

TERMINOLOGY

This guide uses two similar terms that are not interchangeable in the context of this document.

Supplier: any firm that is eligible to compete in a tender and sell goods or services

Member: firms that are RBA members and, depending on membership level, may be obligated to abide by the RBA Code of Conduct and [membership compliance requirements](#)

OVERVIEW OF RESPONSIBLE PROCUREMENT DUE DILIGENCE

There are variations among national and international procurement regimes. This diagram simplifies the multiple complex operations into a few common core steps that are present across geographies. Each step of the procurement cycle can play a role in promoting suppliers' social and environmental responsibility efforts. It is likely that different types of assurances will be needed throughout the process, such as a higher degree of granular data or explanations to support claims of responsible business conduct.

What this diagram does not capture is the wide variation in specific procurement processes due to factors such as the frequency, visibility and scale within a given year, coupled with the applicable legal operating context. There may be phases of intense scrutiny that occur as a result of media exposés, lawsuits, or civil society campaigns, and procurement processes will adjust to respond accordingly.

Most buyers, but especially public buyers, need to operate with transparency to maintain credibility. Often as a result of legislation, transparency has specific requirements, which is why public disclosures are crucial. Existing and new legislation, such as the upcoming EU Battery Regulation or the future EU legal framework on cross-sectoral mandatory due diligence may require suppliers to better understand their supply chains, including where the factories are located and the potential and actual adverse impacts of production. The RBA can help members fulfill this requirement.



P Public Procurement

The additional focus of public procurement is performance requirements: establishing, monitoring and judging their fulfillment. Performance requirements can be managed via assurance processes. They range on a continuum from simple to complex, anywhere from simply communicating a policy to validating the completion of corrective actions by a third-party.

Lastly, reporting is an essential element to transparency and demonstrating that adverse impacts were accounted for and managed in an appropriate manner. The RBA provides visibility and data analytics to members that show data-needs were managed well throughout the cycle. This allows reporting to buyers to be a straightforward and pro forma exercise of documenting everything in one place.

Beyond the basic steps for controlling risk through standards-based compliance, public procurement is beginning to play a role in recognizing, rewarding and incentivizing responsible corporate behaviors. In selection of supplier criteria, buyers promote good corporate behaviors by accepting only bidders that can show they meet requirements on sustainability. This is how public buyers demonstrate that they prioritize not only costs and efficiency, but also socially and environmentally responsible performance.

HOW THE RBA SUPPORTS DUE DILIGENCE

The RBA was founded on the need to provide harmonization, improve supply chain performance and enact trusted oversight. It has evolved systems over the past 15 years that make these functions possible. The types of data-needs that ICT brands and buyers have are very similar to the needs of procurement officers.

A respected framework for global businesses to mitigate adverse impacts is the OECD Due Diligence Guidance for Responsible Business Conduct. The [RBA Practical Guide to Implementing Responsible Business Conduct Due Diligence in Supply Chains](#) provides an overview of major international standards on responsible business conduct and how RBA initiatives, programs and tools help companies operationalize and live up to due diligence expectations that align with the OECD Due Diligence Guidance.

Important elements including the ILO Core Conventions, other key conventions, and common requirements in procurements bids, are embedded in the RBA Code of Conduct, risk assessments, and audits:

- Child labor
- Forced labor (no fees)
- Freedom of association and collective bargaining
- Non-Discrimination/Non-Harassment
- Health and safety
- Working hours
- Wages; and
- Humane treatment of workers
- Emergency Preparedness

P Public Procurement

Where differences lie between public and private buyers, they may be more form than function. For example, private buyers exercise nearly all their leverage prior to purchase orders. This means that private buyers must identify and assess actual and potential adverse impacts at the outset and cannot place an order until the data is collected.

A public buyer has leverage at multiple stages in the purchasing cycle. After the contract is awarded buyers continue to have an opportunity to influence performance requirements for social and environmental practices. Thus, there is room to iterate the assessing of adverse impacts and identifying the best path for managing those impacts.

Below are the steps in the procurement cycle and the RBA tools to consider at each stage.

STEP ONE: PRE-TENDER PLANNING

The two key operations in this step, identified by procurement officers, are social and environmental risk identification and increasing leverage.

I. SOCIAL AND ENVIRONMENTAL RISK IDENTIFICATION

This first step is crucial to embedding responsible business conduct into the tender. During this stage, buyers typically do a geographic risk analysis and calibrate responsible sourcing requirements accordingly. This information is included in the tender as part of the performance requirements for the bidding firms.

How the RBA can help

Harmonized criteria are beneficial for buyers and suppliers. Workers in the supply chain also benefit from a clear set of social and environmental requirements at a factory where they are employed. RBA members have publicly committed to upholding the **RBA Code of Conduct** in their own and suppliers' operations. The Code is often more stringent than legal requirements. Where the law is silent, the Code provides a baseline standard. Where the law is insufficient, the Code raises the standard. For this reason, it is annexed to supplier contracts and it has its own internal requirement to be further cascaded via subcontractor and supplier purchasing agreements. The RBA Code was developed with references to the Universal Declaration of Human Rights, the ILO International Labor Standards, OECD's Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. It is

updated every three years, through a comprehensive multi-stakeholder process. The most recent update was January 2021.²

As part of meeting their membership requirements, RBA Regular and Full Members perform analyses of their risks and are able to engage knowledgeable about their processes to address those risks. This knowledge derives from:

- Access to a proprietary **global risk assessment tool** that compiles public data sources and members' supply chain information to create a composite risk score for comparison against sector peers. This tool helps keep members informed about geographical and inherent risks in their supply chains.
- Members may also access an **inherent risk assessment score** for each supplier determined by location, product type, and purchasing leverage.
- **Corporate Self-Assessment Questionnaire (SAQ)** – RBA members use this SAQ to gain a high-level understanding of their own risks and those within their supply chains.
- **Facility Self-Assessment Questionnaire (SAQ)** – RBA members ask their suppliers to fill out their own SAQs as part of an annual audit planning cycle. Facility-level data allows for unique risks to be considered; such as the employment of foreign migrant workers or the use of student workers.

Procurement staff are encouraged to engage RBA staff or member companies to identify potential opportunities for harmonizing the type of data that will be part of awarding and managing purchases.

II. INCREASING LEVERAGE

Leverage can be exerted in a variety of ways by buyers, most commonly by establishing requirements for suppliers to demonstrate a commitment to responsible sourcing, transparency, and/or evidence for risk-based management of their supply chains. Leverage is a practical outcome of the size of purchasing itself; large buyers or consolidated purchases can increase the opportunity to demand better performance or higher standards.

While exerting this leverage, be aware that requiring large volumes of data may create unintended challenges. In an era of big data, the challenge is less about access and more about making good decisions based on the information. If possible, strive to pinpoint the specific need (such as key identified priorities) and craft a request that won't

RBA TOOLS AND PROCESSES

- RBA Code of Conduct
- RBA membership requirements
- Corporate SAQ
- Facility SAQ
- RBA Voices – Worker Monitoring
- Risk assessment tools (general and inherent risk)
- Validated Audit Process
- Case Management Process

result in an overwhelming volume of data for the person who needs to make procurement decisions.

Conducting audits is a common practice of major brands, however, auditing all suppliers is not only impractical but also disruptive. Many large brands have common suppliers and requiring audits at all facilities would impact the ability for the suppliers to deliver on their commitments.

How the RBA can help

To address this, the RBA offers a systemic supply chain approach. Members are required to assess social and environmental risks across their entire supply chain. Once high-risk facilities are identified, members must audit 25 percent of high-risk suppliers and they can share that audit in the RBA-Online tool with other members that share that supplier, reducing cost and audit fatigue.

RBA members adopt the RBA Code of Conduct as their minimal standard for suppliers (an option to be stricter is available). This can be embedded in contracts to harmonize robust requirements across bidders.

The RBA creates an annual report that offers aggregated audit data and analytics from the entire membership. This provides a helpful sector overview of progress and challenges, as well as a deep dive, on emerging issues and industry trends.

RBA Regular and Full Members are obligated to fulfill [requirements of membership](#). The categories promote advancement of member companies toward Regular or Full status; such members are better equipped to demonstrate their commitment, transparency and risk-based management processes to potential buyers.

² <http://www.responsiblebusiness.org/code-of-conduct/>

The RBA provides members and their suppliers with extensive tools and programs to understand their supply chains, identify risks, implement best practices and establish a framework for continuous improvement. When issues are identified, the RBA works with members on corrective action plans. Companies with shared suppliers, and common recruitment corridors, have market leverage that can be used to affect change. Audits can be shared, reducing audit fatigue, and energy can be focused on corrective action and remediation.

STEP TWO: PRE-AWARD

Engaging prospective suppliers early in the process allows buyers to: (I) assess the maturity of the market relating to social and environmental risks, which assists with creating selection criteria, and (II) communicate relevant expectations to suppliers.

I. SELECTION CRITERIA

Selection criteria incorporate social and environmental disclosures from prospective suppliers. This is the stage where potential suppliers that are implementing effective due diligence on their supply chains can demonstrate their efforts and progress in their sustainability journeys.

Selection criteria can range from simple and readily achievable steps (e.g., require that the supplier has a human rights policy) to advanced programs that may be less common but have high impact (e.g., a forced labor initiative that bans recruitment fees paid by migrant workers).

Procurement staff may be following precedent and/or directives in establishing the selection criteria for a specific cycle.

How the RBA can help

The [RBA Practical Guide to Transparency in Procurement](#) provides a view of how suppliers might commit to, manage and evaluate the impacts or progress of their own responsible business conduct. Buyers may consult the maturity indicators in that guide as one option for creating selection criteria to be used in the tender processes.

Note that RBA members tend to fall into the “better/best” practices as described in the procurement guide and would likely qualify for tenders that incorporate social and environmental performance requirements.

P Public Procurement

Public buyers need to ensure that their selection criteria for social and environmental requirements are aligned with accountability requirements under relevant procurement laws.

II. NOTIFICATION TO SUPPLIERS

Increasingly, buyers foster open and effective competition, deal fairly and without prejudice, and are accountable for decisions. Thus, notifications to the public and/or prospective suppliers typically follow set channels that enhance transparency.

Notifications are becoming more inclusive of social and environmental requirements to maximize their effectiveness at attracting bids from firms that can meet these advancing requirements. Notifications often include:

- Complete supply chain risk assessment
- Required social and environmental performance
- Optional social and environmental award criteria
- Ongoing monitoring requirements

P Public Procurement

Public buyers should also notify suppliers of specific public disclosures or other transparency requirements, if any are embedded within their selection criteria.

STEP THREE: POST-AWARD

This step focuses on the post-award stage of the procurement cycle. The challenges and activities identified in this stage are often beyond the direct contract between supplier and buyer.

SUB-TIER SUPPLIER PERFORMANCE

Buyers often address social and environmental issues in the form of contract performance conditions. These can be powerful, provided there is alignment on indicators to monitor and track adherence to the contract requirements by buyers and suppliers.

Starting with the significant areas of risk identified in the previous steps, suppliers are expected to carry out iterative and increasingly in-depth assessments of high-risk operations to identify and assess actual and potential adverse environmental and social impacts. Procurement professionals are expected to make sure that the audits being used are credible and accessible as part of ongoing supplier management.

How the RBA can help

The [Validated Assessment Program \(VAP\)](#) is a leading on-site social and environmental compliance verification program. It is a comprehensive program that includes a facility risk process and on-site auditing by an independent third party, which incorporates a quality control check before release and a corrective action plan with set closure expectations based on severity. It is designed to be comprehensive and shareable among RBA members. The VAP enhances members' ability to adhere to high audit standards and to ensure consistent implementation of the audit across auditors and geographies.

The [\(VAP\) Closure Audit](#) is a requirement of the VAP program. This third-party audit verifies that the non-conformances identified in the VAP have been contained and corrected, and future recurrence has been prevented.

The [Audit Cooperation Program \(ACP\)](#) allows suppliers to be nominated for a VAP by multiple member companies. The audit is then shared with the members that purchase from that facility. This reduces duplicative audits, audit fatigue and cost.

[VAP Recognition](#) is awarded to factories that have conducted a VAP and Closure Audit, confirming the closure of any egregious issues identified at the site. Buyers can verify the level of commitment of individual factories in relation to social and environmental sustainability through the review of the recognition awarded by the RBA. Multiple governments and international product labels accept VAP Recognition as partial evidence of a company's due diligence program.³

The VAP has an option for an **Audit Program Manager (APM)** to manage the CAP closure process for facilities, should they need extra help.

RBA-Online assists members with organizing supplier information and tracking sub-tiers of their supply chains. Many members are reaching beyond tier one suppliers. RBA members can work with the buyers to show sub-tier trends, in the industry and their specific supply chains, to respond to allegations in the press or claims brought forward by stakeholders.

I. SUB-TIERS

It is a well-known fact that the deeper in the supply chain you go, the more non-conformances are found. Cascading requirements up and down the supply chain so they reach sub-tiers is a challenging but necessary step to ensuring that responsible purchasing practices are embedded along the value chain. Where value chains are complex, such as in the ICT industry, the UN Guiding Principles on Business and Human Rights recommends the prioritization of the most severe adverse impacts or those where a delayed response would make them irremediable.

RBA offers a suite of tools to members that facilitate sub-tier management and oversight, starting with the Code of Conduct. The Code is a complete supply chain standard with requirements handed down to sub-tier suppliers to assure compliance in these crucial areas. Buyers can be reassured by the fact that RBA Regular and Full Members must complete a risk assessment on 80 percent of spend and are required to audit 25 percent of all high-risk suppliers, but many members audit much more. RBA Members have access to trusted and vetted processes for auditing, communication and remediation. Where sub-contracting is necessary, there are supportive systems to ensure success.

RBA TOOLS AND PROCESSES

- Validated Assessment Program (VAP)
- Root cause analysis
- CAP Process management
- APM managed CAP
- Priority / Closure audit
- RLI – Responsible Labor Initiative
- RMI – Responsible Minerals Initiative
- RFI – Responsible Factory Initiative
- VAP Recognition
- RBA Factory of Choice award for meeting a minimum VAP score and having functional worker engagement and communication

3 Such as TCO, EPEAT, BITKOM, DEFRA, SASB

How the RBA can help

An additional way of managing specific sector risks is to require disclosure beyond tier one. The RBA [Responsible Factory Initiative \(RFI\)](#) is a resource used by members to address social or environmental issues relating to sub-tier suppliers that are struggling to meet the Code of Conduct.

RBA also launched the [Responsible Labor Initiative \(RLI\)](#), a multi-industry, multi-stakeholder initiative dedicated to enabling forced labor due diligence deep in international supply chains. The RLI is included in the RBA membership and tools are offered to members and their suppliers.

Raw materials are often where social and environmental impacts are most severe. For buyers that need to understand the deepest part of their supply chain, raw materials, and aim to establish a harmonized approach to monitoring and managing risks, the RBA offers the [Responsible Minerals Initiative \(RMI\)](#).

P Public Procurement

Public buyers have placed added confidence in globally accepted programs with independent oversight. The RFI, RLI and RMI are used around the world as resources and assurance models for responsible procurement practices.

STEP FOUR: CONTRACT MANAGEMENT

This section covers the final stage of the procurement cycle. The key actions identified in this stage in relation to responsible buying are:

- I. PERFORMANCE MONITORING**
- II. SUPPLIER REPORTING**
- III. CORRECTIVE ACTION AND REMEDIATION**
- IV. CLOSURE AUDIT**

As some of the initial procurement staff may not be involved in the eventual execution of the contract, it is crucial that the contract manager understand the social and environmental requirements. RBA tools help buyers and suppliers navigate this landscape throughout the contract.

I. PERFORMANCE MONITORING

To promote responsible business conduct, suppliers must understand their supply chains and sub-contractors and have as much detail as possible. This allows linkages and tiers to be identified, which is necessary for effective oversight to take place. Buyers will assess how well their suppliers are addressing social and environmental requirements while suppliers need to be cognizant of how well they are performing against their commitments to buyers.

RBA members can assess themselves and their supply chains with a mixture of tools, including social and environmental audits, migrant and forced labor investigations, supplier self-assessment, worker voice technology and data analytics. Members use a number of tools designed to track and monitor ongoing performance of their value chains (see annex). An audit to the RBA Code of Conduct is invaluable when it comes to determining which standards are met and where the gaps exist. This is instructive when national laws and their interpretations are not well known by buyers or suppliers.

THE RESPONSIBLE MINERALS INITIATIVE (FORMERLY THE CONFLICT-FREE SOURCING INITIATIVE)

The RMI was founded by the RBA in 2008 as a resource for companies addressing issues related to the responsible sourcing of minerals in their supply chains. It provides information for going beyond tier one disclosure requirements and covers a range of tools and resources, including:

- Responsible Minerals Assurance Process (3TG and cobalt)
- Risk Readiness Assessment
- Minerals Reporting Templates (3TG and cobalt)
- Industry-wide grievance mechanism
- Reasonable Country of Origin Inquiry data
- RMI Learning Academy
- Public global smelter & refiner lists
- Practical guidance documents for industry

More information on the RMI is available on its [website](#).

The *RBA Practical Guide to Transparency in Public Procurement* is designed to help buyers improve the public disclosures of their suppliers, over time, to assess the social and environmental performance when managing the contract.

An example of the benefits of industrywide action is outlined below.

How the RBA can help

RBA Data Analytics is a powerful tool available to RBA members in RBA-Online. The tool allows members to see their own performance side-by-side with the industry. Top issues are identified for members by frequency, country or severity. They can compare their own performance to that of their suppliers as well as those in the electronic industry to those outside the industry. This comprehensive analysis links together multiple tiers of the supply chain, providing a unique perspective of the high-performing suppliers and those with challenges.

The **RBA Quality of Life Metric (QOL)** gives members a comprehensive look at the overall well-being of workers in their supply chain. It measures various elements of the RBA Code of Conduct that directly impact workers; specifically, an algorithm to measure disposable time, disposable income, and health. When a non-conformance is identified it also measures the improvement from initial analysis to the follow-up. Each area is given a specific weighting to allow the most crucial elements to be highlighted. Members can compare the QOL score across suppliers, geographies, or at individual factories.

The **Supplemental VAP (SVAP)** program is a deep dive on a specific topic on the VAP.

- The SVAP on Forced Labor, for example, gives members a process for investigating forced labor at a work site, a labor agent, or recruitment agent.
- The SVAP on Chemical Management is being developed, to provide a deep dive in the area of responsible chemical management. II.

CASE STUDY

Electronics Company and the Supplemental VAP on Forced Labor

The RBA has a “No-Fees Policy” supported by the RBA Definition of Fees, which outlines what fees cannot be charged to workers. This requirement is beyond most local laws. An electronic manufacturer in Malaysia learned in 2019 that some of its work force had been exploited by a labor agent. Workers from that agency had their passports confiscated, wage payments delayed for months, illegal wage deductions made, and violent threats issued when they complained. They also worked excessive overtime.

Once aware of this situation, the RBA immediately convened a group of member companies that sourced from the supplier to share information on a pre-competitive basis and engaged senior management at the factory providing information on the RBA Code of Conduct, RBA tools and programs, and forced labor-related risks in Malaysia.

Restitution was made, and paid transportation was offered for transit to their home countries.

The company then completed the RBA’s SVAP on Forced Labor, a special tool and program dedicated to the ethical employment of migrant workers. The SVAP worked with the factory to transition it to a practice of no-fee recruitment and supervision of recruitment and labor agents. To date, all employees have been paid back and policy changes have been identified to evolve toward zero fees recruitment. The RBA continues to work with and monitor this supplier to ensure no recidivism takes place.

P Public Procurement

Public buyers are sometimes held to additional scrutiny when an NGO or media report is published showing alleged violations to their supplier’s code of conduct. Additional due diligence, transparency, and remedy outlined in contracts can quickly address any allegations. Having a globally accepted standard allows buyers to identify the root cause and implement actions based on a respected framework.

II. SUPPLIER REPORTING

A range of options are available for company disclosure globally, which often causes confusion in how companies and buyers approach reporting. RBA members report against the RBA Code of Conduct, and there are a number of benefits for buyers that harmonize their goals with the RBA Code, including:

- Clarity on reporting requirements and salient metrics
- Reduced misinterpretation stemming from different reporting frameworks
- Consistent, effective comparisons among suppliers
- Foster fair competition in the market
- Facilitates decision-making
- Enhances efficiency
- Minimizes costs

How the RBA can help

The RBA creates an **annual report** that includes aggregated data from the entire membership, designed for an external audience, which shows the state of the industry, impacts and challenges that members can use to discuss the realities of manufacturing.

The RBA has significantly advanced its **data analytic** capabilities and provides members with information on their performance, and that of their supply chain, over time.

RBA Membership Levels define the requirements for the members in that category.

RBA Full Members are those companies that:

- Perform a risk assessment on 100 percent of their owned facilities and 80 percent of their spend.
- Conduct, at a minimum, audits on 25 percent of their high-risk suppliers each year.
- Publish their sustainability data, including aggregated audit results.
- Submit verification to the RBA of the closure of non-conformances (among other qualifying criteria).

Membership requirements are advancing in 2021.

III. CORRECTIVE ACTION AND REMEDIATION

One of the key activities in the procurement cycle is Corrective Action and Remediation. This step, applied when needed, is the most impactful step in the process.

- If risk identification indicates severe adverse impacts, a corrective action plan is required of the supplier, or the supply chain of that supplier.
- Corrective action timelines should be specified early in the process and should include containment, root-cause analysis, corrective action and preventative steps to prevent reoccurrence.
- If adverse impacts resulted from procurement, such as unrealistic delivery times or last-minute increases in volume, the buyer and supplier should determine a way to address the impacts together through corrective action.
- Corrective Action Plans should be verified through a third-Party closure audit.

How the RBA can help

RBA Voices: The RBA Code contains a provision that requires grievance and complaint channels are available to workers. With the RBA's Worker Voice tool, members and their suppliers can improve conditions in their international supply chains by giving workers more ways to provide feedback and learn important professional and personal skills while providing companies with greater visibility into facilities.

The **RBA Grievance Mechanism** for use by factories and workers

- The VAP Corrective Action Process requires a factory to have a fully functioning grievance process. When there is no grievance process, it results in a non-conformance that must be closed within the time frame outlined by the VAP program. A closure audit, by an approved third-party audit firm, is required to verify conformance.
- The SVAP has a requirement for remediation that includes RBA oversight and tracking.
- The RBA offers Advisory Services to members and their suppliers if they do not know how to set up an effective grievance mechanism, or they want to utilize an independent third-party.

Assessing performance through suppliers' disclosures and responding to challenges is an increasingly utilized component of responsible sourcing. The case study below is an example of industry best practice for remedy. Remedy is embedded in the public procurement cycle.

CASE STUDY

Electronics Company – Working to Eliminate Debt Bondage

A Thai electronics factory was publicly criticized in 2016 for having forced labor conditions due to migrant workers experiencing debt bondage to obtain employment. The debt was owed to independent private recruitment agencies and brokers, a complex web of influence that took three years to mitigate and change. The company's work with the RBA and civil society eventually led to restitution payments to more than 10,000 workers, and a total estimate of the fees that had been collected from the workers was ~US\$10M or approximately \$660 per worker.

- The RBA worked with several member companies in finding resolution.
- The company initiated several key changes, including:
 - Workers keep their own passports and work permits
 - Reimbursements for recruitment fees and related costs
 - Direct contracts to the company rather than through agencies
 - Contracts in workers' native languages
 - Legal rights trainings for migrant workers, as well as training on pay slips, voluntary overtime, and chemical hazard information
 - Recruitment agents' contracts updated to prohibit charging fees and keeping passports or permits
 - A pause on hiring migrant workers while the company enhanced its ethical recruitment policy and systems

P Public Procurement

While tenders require remedy, when necessary, public buyers are often not experts in the process or the verification of remedy. Setting expectations with suppliers that they should participate in programs like the Responsible Labor Initiative allows buyers to incorporate elements of responsible labor sourcing, including elements of remedy, directly into the public contract and then depend on that framework throughout the public procurement process, as necessary.

How the RBA can help

Buyers can set expectations with suppliers, prevent misconduct, or address issues identified in an audit. The RBA has trainings for companies, their suppliers, and the workers who build their products. All of these are accessible through the RBA Learning Academy or RBA Voices App.

FBA Factory Lead Certification offers a way for sites to train their staff on the RBA Code of Conduct, the audit program, corrective action, and remediation. Based on data since the inception of the program, sites with a certified RBA Factory Lead have a 26 percent higher VAP Audit score than sites that do not have a certified RBA Factory Lead.

CONCLUSION

In a world with increasingly dynamic supply chains, the need for collaboration and harmonized tools that meet internationally recognized standards in responsible procurement is greater than ever. Public and private buyers, along with RBA members, will benefit from a harmonized approach to requirements and disclosures throughout the contracting cycle. Collectively, the RBA, its members, and public buyers, can have a greater impact than any one organization alone, as demonstrated by these metrics.

RBA IMPACT METRICS*



*As of March 2021

The RBA vision is to be a coalition of companies driving sustainable value for workers, the environment, and business, throughout the global supply chain, which is evident in the outcome our programs and measured by the RBA Quality of Life metric.

RBA QUALITY OF LIFE METRIC*

QUALITY OF LIFE METRIC

RBA has long agreed that the magic happens in the closing of audit findings, not the identification of them. The RBA Quality of Life measures specific VAP metrics that indicate a worker's amount of disposable time, disposable income, and health (mental and physical).

33.7%
Improvement

in "Quality of Life" score at factories with a Closure Audit

2.1M
Workers

Who saw an improvement in Time, Wages, Health or all three

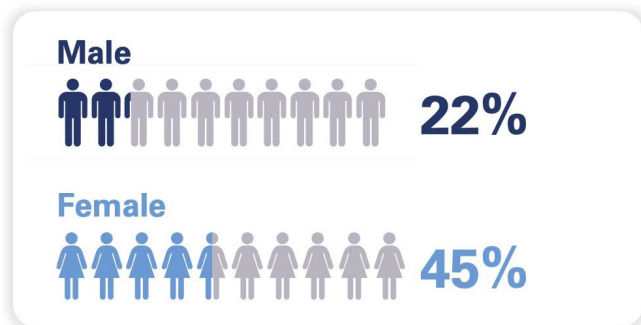
8.2%
More Time

3.9%
Better Wages

78.4%
Overall Health

BY GENDER

As expected, these metrics affect men and women differently. In order to normalize the data, we took the percentage of men and women, rather than the actual counts, and applied the algorithm. The data showed that women saw double the improvement in QOL than that of their male coworkers.



Data source: RBA Online, RBA Working Hours Template n=2,151,984

Members of the RBA know the value of working from the same playbook to harmonize sustainability standards. Members are experienced with a continuous improvement model, opportunities for harmonization, and advancing the RBA mission. Members will benefit from:

- Following this guide to demonstrate they utilize the tools and processes offered by the RBA to meet the demands of procurement.
- Promoting this guide to buyers to drive harmonization and alignment of requirements.

GLOSSARY OF TERMS

Award criteria / selection criteria – a set of criteria against which the tender is decided (using a points system or other grading method).

Leverage – the ability to effect change in the practices of another entity (e.g., via contract requirements).

Member – Responsible Business Alliance member companies.

NGO – Non-Governmental Organization

Public Buyer – individuals or institutions with the responsibility for the procurement of goods and services for government entities.

Procurement Cycle – the cycle of buying that follows these core stages: pre-tender planning, pre-award, post-award, and contract management.

Public Procurement – the process by which public authorities, such as government departments, local authorities, and state-owned enterprises purchase work, goods or services from companies.

SAQ – self assessment questionnaire, a form of self-disclosure often used as an early step in a risk assessment process.

Supplier – a company supplying goods and services to a buyer.

Tender – a type of public procurement process that involves competitive bidding by suppliers.

VAP – Validated Assessment Program, the RBA's carefully managed third-party audit system that creates and monitors performance against Corrective Action Plans (CAPs), incorporates external oversight and features a complaints procedure.

ANNEX

The annex below maps RBA tools and Practical Guides against each stage of the procurement cycle for reference.

STAGE IN THE PUBLIC PROCUREMENT CYCLE	STEP	RBA TOOLS
<p>Pre-tender planning</p>	<p>Social and environmental risk identification</p>	<p>RBA Risk Assessment – The RBA’s Risk Assessment Platform is the first step in the RBA Risk Assessment Model, which can be utilized by RBA members for Due Diligence efforts to help ensure supply chain sustainability. It introduces a new rating model that provides a dynamic scoring method, providing a high-quality risk analysis and a confidence score for each supplier site evaluated. Features include:</p> <ul style="list-style-type: none"> • Use of real audit data as an indicator in risk ratings • Dynamic scoring algorithm, including confidence scores for each rating • Full access to all index scores for every indicator • Full indicator download/export for custom member use • Enhanced supplier list management features • Support of RMI and RLI exclusive indicators <p>RBA Sensing Survey – An online survey tool that helps members identify key risks in the aggregated supply chain for the industries RBA represents. This information can support members as they conduct their own supply chain assessments.⁴ The tool is not open source.</p> <p>Corporate SAQ – The RBA Corporate Level SAQ is a tool designed to help members identify social, environmental and ethical risks in their own supply chains and provides a high-level understanding of risks in members’ areas of operation.⁵ It is one of the RBA’s risk assessment tools. It is completed within RBA’s sustainability data management system – RBA-Online.</p> <p>Facility SAQ – The Facility SAQ helps members obtain a detailed understanding of their own facilities and supply chain risks to assess risk management systems and identify gaps. Members are strongly encouraged to use it.⁶ It is one of the RBA’s risk assessment tools. It is completed within RBA’s sustainability data management system – RBA-Online.</p> <p>Indirect Spend Tool – The RBA offers members access to self-assessment questionnaires and audit protocols that can be applied to members’ indirect supply chain suppliers, such as call center providers, security guard services, landscapers, and facilities management providers. The tool is not open source.</p>

4 Practical Guide to Implementing Responsible Business Conduct Due Diligence in Supply Chains, p. 7

5 Ibid.

6 Ibid.

	Increasing leverage	<p>RBA Code of Conduct (CoC) – The RBA CoC establishes standards to ensure that working conditions in the electronics industry, or industries in which electronics are a key component, and its supply chains are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.⁷ The Code requires compliance with local laws and encourages adherence to internationally recognized standards, which the CoC encompasses.</p> <ul style="list-style-type: none"> Participants must regard the Code as a total supply chain initiative. At a minimum, participants shall also require its next tier suppliers to acknowledge and implement the Code.⁸ The CoC is made up of five sections: <ul style="list-style-type: none"> A – standards for labor B – standards for health and safety C – standards for the environment D – standards relating to business ethics E – outlines the elements of an acceptable system to manage conformity to the CoC <p>Audit Cooperation Program (ACP) – The ACP allows members to nominate their suppliers for a VAP audit. Suppliers nominated by multiple members will be approached by RBA staff to conduct a VAP. This use of industry leverage is in line with international recommendations. Members nominating the supplier commits to accepting the VAP.⁹</p>
Pre-award	Selection criteria	<p>Inherent Risk Profile – This tool includes information on a supplier’s inherent risk, including geographic location, product or service provided, spend level from customer, and exclusivity of product. The system can also integrate management proficiency data from the SAQs and audit scores. The tool combines this data to give members a composite risk level score per supplier.¹⁰ This tool is not open source.</p>
Post-award	Conditions for performance of contracts	<p>Validated Assessment Program (VAP) – RBA Validated Audits, which are part of the RBA Validated Assessment Program (VAP), uncover non-compliances to the Code of Conduct, which are verified by an independent third-party audit firm. This ensures adherence to high audit standards as well as consistent audit implementation across geographies, audit firms, and even individual auditors. All Validated Audit findings have specified periods of time during which the facility in question must remedy the findings and implement systems to prevent reoccurrences. By leveraging the documented, repeatable RBA processes, buyers can track progress across suppliers and regions in a consistent way.¹¹</p>

7 RBA CoC 7th Edition (2021), p. 1

8 Ibid.

9 [http://www.responsiblebusiness.org/vap/rba-audit-cooperation-program/#:~:text=The%20Audit%20Cooperation%20Program%20\(ACP%20approved%20by%20the%20supplier%20auditee.](http://www.responsiblebusiness.org/vap/rba-audit-cooperation-program/#:~:text=The%20Audit%20Cooperation%20Program%20(ACP%20approved%20by%20the%20supplier%20auditee.)

10 Practical Guide to Implementing Responsible Business Conduct Due Diligence in Supply Chains, p. 7

11 RBA Practical Guide to Transparency in Procurement, p. 4

		<p>List of RBA Audit Partners</p> <p>A typical VAP onsite audit at a single manufacturing facility may last 2-5 days and includes a thorough document review, interviews with management and employees and a visual site survey.¹²</p> <p>The VAP process consists of risk assessment (via the risk assessment platform and an SAQ), monitoring (VAP) and CAP¹³</p> <p>VAPs can be shared between RBA members.</p> <p>VAP Closure Audit – is a third-party verification that the issues identified in a VAP have been contained, corrected, and prevented from recurrence.</p> <p>VAP Recognition – Factories that successfully complete a VAP, closing audit findings and verify closure through a VAP Priority Closure or VAP Closure audit, are recognized with a certificate valid for two years from last day of initial audit.¹⁴ There are three levels of RBA Recognition:</p> <ul style="list-style-type: none"> Platinum – social and environmental leader with all audit findings closed (min. VAP score of 200) Gold – above average sustainable factory with Priority and Major findings closed (min. VAP score of 180) Silver – Sustainable factory that closes Priority findings via VAP (min. VAP score of 160)¹⁵ <p>Supplemental Validated Audit Process (SVAP) – SVAP is an assessment program based exclusively on identifying specific risks such as the risk of forced labor at an Employment Site (e.g., factory) or Labor Provider (e.g., labor agent or recruitment agency).¹⁶ While a VAP focuses on all the aspects of the RBA Code of Conduct (CoC), SVAP focuses solely on the focus topic.</p> <p>SVAP process consists of an SAQ, on-site SVAP audit, CAP and (priority) closure audit done on-site.</p> <p>SVAP can be combined with a VAP.</p>
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12 <http://www.responsiblebusiness.org/vap/about-vap/>

13 RBA Validated Assessment Program (VAP) Overview, p. 2

14 Ibid. p. 36

15 Ibid.

16 RLI SVAP Overview

		<p>Customer Managed Audit (CMA) – CMA is an assessment of a facility overseen by one of the facility’s customers while referencing RBA requirements for that assessment.¹⁷ Members that do not choose to use the VAP may use CMA. It is conducted by an RBA audit partner and is executed against the RBA VAP protocol.¹⁸ A CMA does not have an RBA QC review.</p> <p>Auditee Managed Audit (AMA) – AMA is an assessment overseen by the auditee while referencing RBA requirements for that assessment.¹⁹ Members that do not choose to use the VAP may use AMA. It is conducted by an RBA audit partner and is executed against the RBA VAP protocol.²⁰ An AMA does not have an RBA QC review.</p> <p>The RBA does not have oversight into CMAs or AMAs and for this reason, only VAPs are endorsed by the RBA</p> <p>Responsible Factory Initiative (RFI) – The RFI provides a unifying architecture for RBA factory-level tools and programs for companies looking to assess and develop their supply chain partners and factories at all levels of maturity.</p>
<p>Contract management</p>	<p>Member monitoring through assessments and reviews</p>	<p>Practical Guide to Due Diligence on Recruitment Fees in International Supply Chains – This Guide provides practical advice on how the “no-fees” element of the Code of Conduct should and could be implemented. It builds on in-house RBA guidance, the experience of RBA and RLI members, guidance and learning from international agencies, advocates for migrant workers, and guidance from other leading initiatives. It includes examples of emerging industry good practices, tools and guidance to help companies operationalize and promote a “no-fees” recruitment policy for the benefit of workers.²¹</p> <p>The guide outlines eight core processes:</p> <ol style="list-style-type: none"> 1. Embedding “No fees” requirements 2. Identifying the risks 3. Monitoring and auditing 4. Remediation and repayment 5. Moving to no-fees recruitment: Engaging with suppliers 6. Moving to no-fees recruitment: Engaging with recruiters and other stakeholders 7. Tracking progress 8. Reporting and Transparency

17 <https://www.tuvsud.com/en-gb/services/auditing-and-system-certification/responsible-business-alliance>

18 <https://www.elevatelimited.com/services/assessments/social-environmental/rba/>

19 <https://www.tuvsud.com/en-gb/services/auditing-and-system-certification/responsible-business-alliance>

20 <https://www.elevatelimited.com/services/assessments/social-environmental/rba/>

21 RBA Practical Guide to Due Diligence on Recruitment Fees in International Supply Chains, p. 2

		<p>Practical Guide to Implementing Responsible Business Conduct Due Diligence in Supply Chains – The Guide provides an overview of the major standards on responsible business conduct and demonstrates how RBA tools, best practices, initiatives and services can help companies operationalize and live into international supply chain due diligence expectations.²²</p> <p>The Guide uses the OECD Due Diligence Guidance for Responsible Business Conduct as an overarching framework for supply chain due diligence.</p> <p>The Guide is a living document that is periodically updated.</p> <p>The due diligence process as per OECD Guidance consists of six main steps:</p> <ol style="list-style-type: none"> 1. Embed responsible business conduct 2. Identify and assess adverse impacts 3. Cease, prevent or mitigate 4. Track 5. Communicate 6. Provide for or cooperate <p>Practical Guide to Transparency in Procurement – The Guide is a resource for buyers to make it easier to assess companies’ disclosures on social and environmental responsibility and meet their own sustainable purchasing goals.</p> <p>It sets out a roadmap of indicators so that any company can use this Guide to begin their CSR transparency journey. It looks at commitments, systems, and impact and has designed indicators around those.</p>
	<p>Supplier reporting on minerals</p>	<p>The Conflict Minerals Reporting Template (CMRT) – The Conflict Minerals Reporting Template (CMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the RMI’s Responsible Minerals Assurance Process (RMAP).²³</p> <p>CMRT in an Excel format can be downloaded here.</p>

22 Practical Guide to Implementing Responsible Business Conduct Due Diligence in Supply Chains, p. 2

23 <http://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>

OECD QUESTIONS FROM THE OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE BUSINESS CONDUCT

QUESTIONS FROM THE OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE BUSINESS CONDUCT:²⁴

Questions related to the due diligence process:

A.1. Embed responsible business conduct into policies and management systems

- Q14. What goes into RBC policies?
- Q15. What expertise can be drawn upon in developing RBC policies?
- Q16. Which teams or business units will be relevant to consider when developing and aligning objectives with the enterprise's RBC policies?
- Q17. What are the distinctions in the role of the board and management in ensuring RBC is embedded?
- Q18. How can RBC expectations be built into business relationships?

A.2. Identify and assess actual and potential adverse impacts associated with the enterprise's operations, products or services

- Q19. What is meant by scoping and how broad should an enterprise's scoping exercise be?
- Q20. What is meant by sector, product, geographic, and enterprise-level risks?
- Q21. What are example sources of information for desk-based research?
- Q22. How might information deficits be addressed?
- Q23. How can an enterprise assess risks of adverse impacts in its own activities?
- Q24. How can an enterprise prioritise which of its own operations or business relationships to assess first?
- Q25. How can enterprises carry out assessments of business relationships prioritised during its scoping?
- Q26. What can an assessment of business relationships cover and who should conduct these assessments?
- Q27. When to assess business relationships?
- Q28. How can enterprises assess business relationships with whom they do not have contractual relationships?
- Q29. What is meant by adverse impacts that are "caused", "contributed to" by the enterprise or are "directly linked" to its operations, products or services by a business relationship?
- Q30. Why does the way an enterprise is involved with adverse impacts matter?
- Q31. How can an enterprise prioritise its actions when seeking to prevent and mitigate adverse impacts across its activities and business relationships?

A.3. Cease, prevent and mitigate adverse impacts

- Q32. What is the difference between preventing adverse impacts and mitigating adverse impacts?
- Q33. How should an enterprise prevent and mitigate actual or potential impacts it may cause or contribute to?
- Q34. How can an enterprise seek to prevent and mitigate actual or potential impacts directly linked to its operations, products or services by a business relationship?

24 <http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>

- Q35. How can an enterprise modify its operations or activities to prevent and mitigate adverse impacts linked to its business relationships?
- Q36. How can an enterprise use its leverage?
- Q37. How can a lack of leverage be addressed?
- Q38. How can an enterprise support a business relationship in the prevention or mitigation of adverse impacts?
- Q39. How can an enterprise approach disengagement?

A.4. Track implementation and results

- Q40. How can an enterprise seek to prevent and mitigate adverse impacts linked to business relationships with whom it does not have a contractual relationship?
- Q41. What information is tracked under due diligence?
- Q42. How can an enterprise track implementation and results?
- Q43. Who is involved in tracking implementation and results within an enterprise?
- Q44. How can an enterprise respond to the results of its tracking?
- Q45. How to prioritise tracking activities?

A.5. Communicate how impacts are addressed

- Q46. What are appropriate forms of communicating publicly and to impacted stakeholders?
- Q47. When information is commercially sensitive, how can relevant information still be communicated?

A.6. Provide for or cooperate in remediation when appropriate

- Q48. What is the relationship of remediation to due diligence?
- Q49. What is meant by “remediation” and “remedy”?
- Q50. How can an enterprise identify appropriate forms of remedy?
- Q51. What are “legitimate remediation mechanisms”?
- Q52. What does it mean to “cooperate with legitimate remediation mechanisms”?
- Q53. In which circumstances are various processes to enable remediation appropriate?
- Q54. What is the difference between an early warning system and a process to enable remediation?

RESPONSIBLE PURCHASING CHECKLIST FOR BUYERS

RESPONSIBLE SOURCING REQUIREMENT	RBA TOOL, PROGRAM, OR RESOURCE TO ASSURE THE REQUIREMENT IS BEING MET	SUPPLIER (YES/NO)
Embedding Responsible Business Conduct	RBA Membership	
	RBA Statement on supplier website	
	RBA Code of Conduct Communicated to Sub-Tier	
	Sample Supplier Contract	
Supply Chain Risk Assessment	Use of RBA Risk Assessment Platform	
	Use of RBA SAQ	
	Use of RBA Risk Readiness Tool for Forced Labor	
Increased Leverage	Use of RBA Audit Sharing Program	
	Use of RBA Grievance Program	
Selection Criteria	Utilizes framework outlined in the RBA Practical Guide to Transparency in Procurement, or similar framework	
Conditions of Performance	All elements in RBA Code of Conduct	
	Active RBA Membership	
	Utilizes RBA VAP Recognition Program	
Performance Monitoring, Including Supply Chain Implementation of company Policies and Codes		
	RBA VAP	
	RBA SVAP	
	RBA Closure Audit	
	RBA Voices Program	
	RBA RMI Program	
	RBA RLI Program	
	Other equivalent monitoring program	
	RBA Quality Check (QC) process	
Corrective Action		
	RBA CAP	
	RBA SVAP	
	RBA Factory Engagement Program	
	RBA Advisory Services	
	Other equivalent Corrective Action Program	

Continuous Improvement	RBA Factory of Choice Program	
	RBA Practical Guide to No-Cost Recruiting	
	RBA Worker Voices Mobile Training Program	
	RBA Factory Lead Site-Level RBA Certification Program	
	RBA Learning Academy	
Grievance Mechanism	RBA VAP	
	RBA Voices	
	RBA Responsible Workplace Program	
	Other equivalent Grievance Program	
Reporting	RBA Practical Guide to Transparency in Procurement Framework	
Remedy	RBA Advisory Services	
	Other third-party remedy oversight	



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